

A Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of the Spotted Dog Wildlife Management Area and Neighboring Private Lands



Draft Environmental Assessment
February 26, 2019

Region 2, FWP, 3201 Spurgin Road, Missoula MT 59804





Elk on the McQueary Ranch, March 10, 2018, taken by FWP Wildlife Biologist, Julie Golla, during her annual aerial survey with FWP pilot Trever Throop.



PART I. PROJECT OVERVIEW AND DESCRIPTION OF THE PROPOSED ACTION

In 2010, Montana Fish, Wildlife & Parks (FWP) applied to the Montana Natural Resource Damage Program (NRDP) for funding to purchase and establish the Spotted Dog Wildlife Management Area (WMA) for the stated purpose, among others, of “enhancing critical winter habitat for elk.” The purchase was completed on September 2, 2010.

From 2011 to 2018, FWP’s annual surveys of the Spotted Dog elk population confirmed that the WMA contains most of the elk winter habitat under average winter conditions, but not all of it. And, in severe winter conditions, such as in January-March 2018, elk use less of the WMA as critical winter habitat, due to the lay of the land and natural patterns of snow accumulation—factors beyond management control. In

severe winters, elk also make greater use of critical winter habitat on private land, such as the McQueary Ranch, which abuts the south boundary of the WMA (Figure 1).

On March 10, 2018, FWP’s aerial survey of the elk population that winters on or close to Spotted Dog WMA found 2,650 elk in Hunting District 215, of which 606 elk (23%) were wintering on McQueary Ranch property, adjacent to the south boundary of the WMA. The elk count on the Ranch amounted to 46 percent of the elk counted north of Cottonwood Creek; i.e., on and around the WMA (Figure 2).

These data suggest that certain private lands are integral to meeting the WMA’s purpose of “enhancing critical winter habitat for elk.”



Figure 1. A view across contiguous, critical winter habitat for elk, looking north-northwest from the McQueary Ranch (foreground) to Rocky Ridge on the Spotted Dog WMA, a line of sight spanning about 7 miles. This photo was taken on June 12, 2018, reflecting the combined effects of site, soil, historic use by livestock and increased use by elk. During severe winter weather, most elk are found along or below the BPA powerline, both on the WMA and the McQueary Ranch.

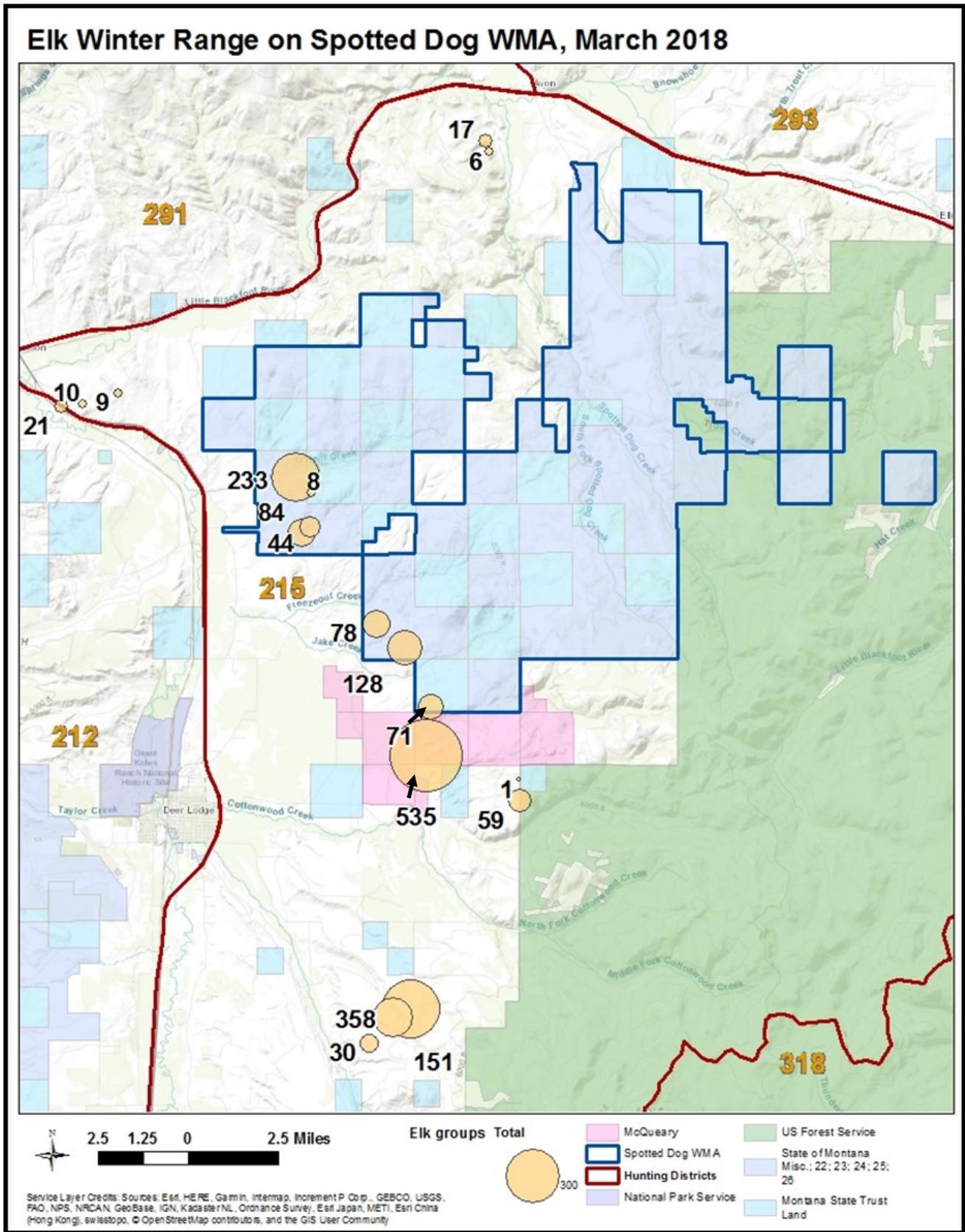


Figure 2. GPS waypoints of elk groups counted on and around Spotted Dog WMA during FWP’s annual aerial survey on March 10, 2018. Elk group sizes are shown by the black numbers beside each brown circle, and the relative sizes of the circles depict the relative sizes of the elk groups. The largest group of 535 elk was seen on the McQueary Ranch (depicted in pink), on private rangelands that would receive rest from cattle grazing as a result of the proposed grazing arrangement involving a portion of the WMA.

From 2013 to 2019, FWP began exploring opportunities and avenues for cooperating with neighbors to the WMA on behalf of fish and wildlife habitat. In 2013, FWP solicited citizen interest and formed the Spotted Dog WMA Work Group for this purpose.

FWP and the Work Group collaborated to develop a revised and expanded *Wildlife Management Area Habitat Plan (March 2018)* for Spotted Dog WMA. This effort developed a broader context for management, within which elk winter habitat is an important, but not exclusive objective. The Executive Summary for the Habitat Plan may be found at the end of this environmental assessment (EA), in **Appendix A**.

The Habitat Plan identifies at least 1/3 of the contiguous WMA acreage that is not and cannot be made into elk winter range (i.e., Management Unit 3), and identifies priorities that overlap the winter range for fish and wildlife Species of Concern, native species diversity, and aspen, wetlands and

riparian habitats. This understanding further emphasizes that the WMA is “part of a larger whole,” to quote the Habitat Plan, including a larger, essential landscape and ecosystem than the WMA alone.

An Ecological Inventory and Health Assessment of Spotted Dog WMA (Hansen et al. 2015) formed a foundation for the Habitat Plan and FWP’s approach to future management. This product described a visually stunning landscape (Figure 3) in terms of a mosaic of ecological health, ranging from near pristine to unhealthy and nonfunctional, depending on the site in question.

Upland grasslands were in the best ecological condition overall, while riparian and wetland habitats were the most impacted communities on the WMA (Figure 4). Therefore, FWP’s emphasis in the development of this proposal and EA is in minimizing effects and promoting the recovery of wetlands and riparian areas on the WMA (Figure 5).



Figure 3. A view across the WMA from the Avon (Trout Creek) entrance on June 11, 2018, looking west over Spotted Dog Creek toward the Flint Creek Range.

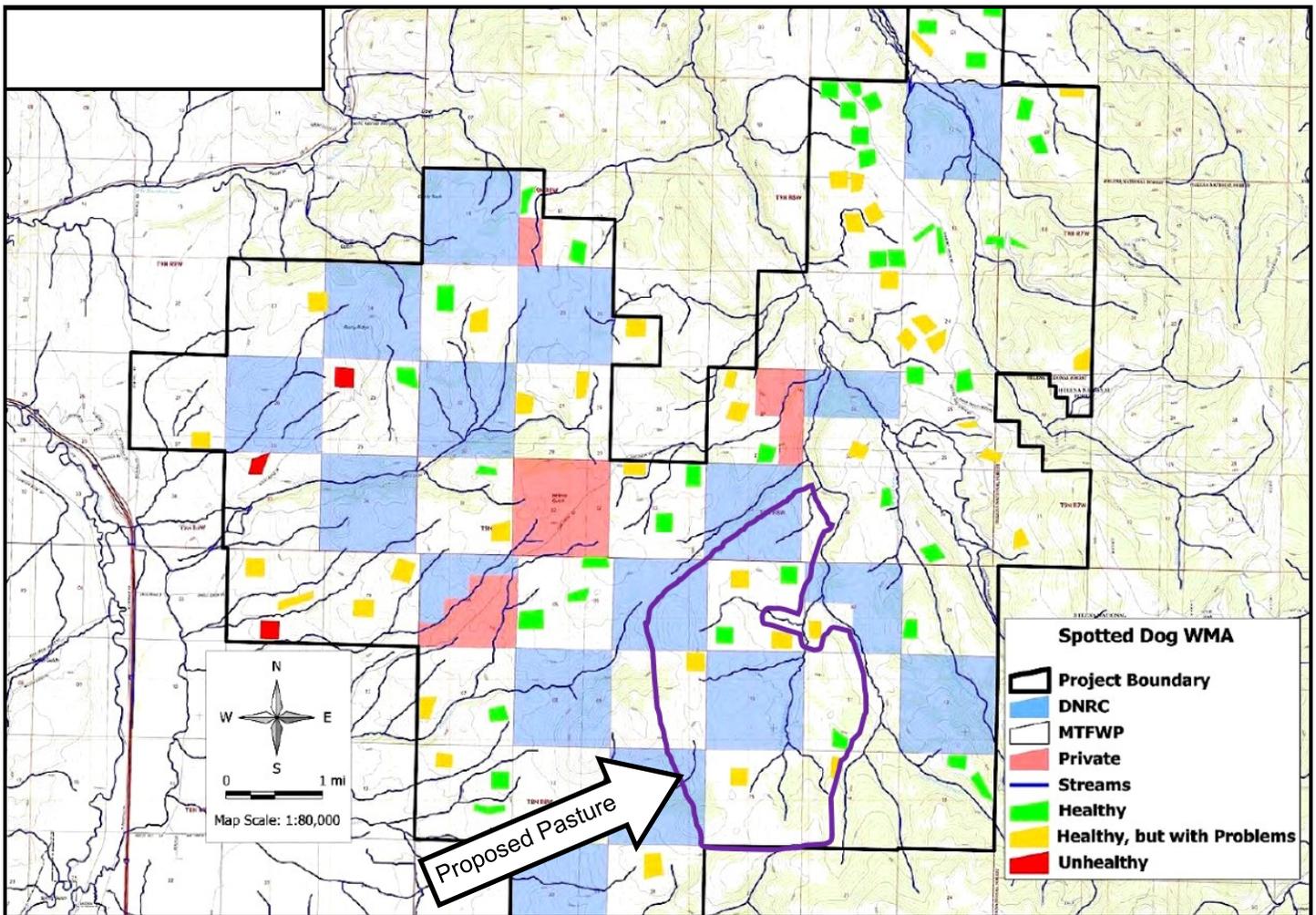


Figure 4. Map of 192 ecological sampling plots across Spotted Dog WMA, adapted from Hansen et al. (2015). For display purposes and ease of interpretation, the ecological health ratings at the plot locations are generalized as healthy (green), healthy but with problems (yellow) and unhealthy (red). The general outline of the area on the WMA that is proposed herein for pasturing cattle is drawn in blue, showing that about 8 percent of the WMA would be pastured (only about 2 percent per year) and that the proposed pasture area tends to be rated as healthy or healthy but with problems.

Figure 5. West Fork Spotted Dog Creek on June 12, 2018, which is representative of the appearance of riparian areas in the proposed pasture on the WMA. Riparian areas and wetlands would be fenced, except for selected water gaps, and water gaps would be rested 3 years for every 1 year used by cattle. FWP fisheries and nongame wildlife biologists would identify the best options for providing stock water while protecting and enhancing habitat for amphibians and other species on the whole. The use of temporary fencing rather than relying entirely on permanent fencing would allow flexibility to respond to impacts and concerns as we go.



Cattle grazing on the WMA was a consistent topic of interest in the deliberations of the Work Group, and the Habitat Plan preserves a body of public comment on grazing at the back of that document. FWP has brought that public comment forward to inform this new proposal and EA in **Appendix B**.

FWP's management direction since acquiring the WMA has been to exclude livestock until the Habitat Plan could be completed, and thereafter until the habitat enhancement opportunity for a grazing treatment came to light. Notably as an exception to this intent, Rock Creek Cattle Company grazed the WMA per the terms of its pur-

chase agreement with FWP from 2010 through 2013.

The cessation of grazing at the end of 2013 greatly decreased the number, distribution and duration of cattle presence on the WMA, and FWP's sequential replacement of old boundary fences contributed to ever-lessening cattle trespass (Figure 6).

Some cattle from a summer grazing allotment on the Helena National Forest make their way onto the WMA across an unfenced boundary, where FWP has scheduled the installation of new fencing when a land exchange with Cross Canyon Ranch is finalized, hopefully this spring.



Figure 6. Representative snapshots of the standing crop on the proposed WMA pastures, involving potentially 8% of the WMA. Photos were taken on various sites on June 12, 2018, illustrating an ecological condition termed as healthy or healthy with problems by Hansen et al. (2015). This represents the current status and cumulative effect on native plant composition and vigor of permitted cattle grazing in 2010-2013 and sporadic trespass grazing since that time.

In 2017-2018, FWP met individually with neighbors who expressed interest in grazing their cattle on the WMA. FWP came to these conversations with an interest in improving wildlife habitat on private land by adjusting cattle grazing there, by mutual consent, as well as on the WMA.

It was a lot to ask of the commercial livestock operators and many practical considerations made the arrangement infeasible for most ranchers at that time. Likewise, the requests that commercial livestock operators made of FWP for entering into a mutually beneficial arrangement were often incompatible with FWP's goals for the WMA.

In the end, this effort did identify a good fit with the range management goals and interests of the McQueary Ranch, which contains the largest block of privately owned, critical winter habitat for Spotted Dog elk (Figure 7).

The proposed agreement for a cooperative grazing system involving selected pastures on the WMA and McQueary Ranch is the subject of this EA and is attached in **Appendix C**.

This proposal would provide yearlong rest from cattle grazing on 1,400-1,500 acres of a 2,100-acre pasture system—on a rotational basis—on the McQueary Ranch. In effect, this would leave all of the growing season's forage production on those rested private lands for elk to use in the winter. This would effectively expand the managed footprint of the WMA to include a defined portion of neighboring private land for elk.

In return, cattle from the McQueary Ranch would



Figure 7. FWP Wildlife Habitat Biologist, Kelvin Johnson (left), discussing grazing and rest effects on the root reserves of native plants with Dan McQueary, on Spotted Dog WMA.

graze 600-750 acres annually on the WMA (Figure 8). The acres to be grazed would be contained within a 2,800-acre perimeter, involving about 8 percent of the WMA. Each 600 to 750-acre sub-pasture would be grazed once in June-July in every 4 years, and would be rested year-long from cattle in the intervening 3 years.

This rest-dominated application of a rest-rotation grazing strategy on the WMA would allow grasslands and riparian areas to continue improving within the 2,800-acre treated landscape, though perhaps at a slower pace than if rested from cattle completely (Hansen, personal communication).



Figure 8. The view looking across the proposed pasture on the WMA, looking east from the west boundary of the Fir Island sub-pasture area (Appendix C). The closest two clumps of forest in the center and right of the picture account for the name, "fir island." The photo was taken by Kelvin Johnson on June 12, 2018.

The WMA lands are not elk winter range. They provide spring (April-May) and fall forage for elk as they migrate between summer and winter ranges. Plant regrowth on previously grazed pastures is attractive to elk in spring and fall.

Portions of the West Fork of Spotted Dog Creek flow through the proposed WMA pasture system and portions of Fred Burr Creek flow through the proposed private pasture system. The yearlong rest provided in the WMA pastures in three of every four years, and in the private pastures in two of every three years would be expected to conserve riparian resources.

In addition, cattle would be largely fenced out of the streams and wetlands on the WMA pasture system. Cattle would be grazed in privately owned pastures in August-September, when livestock would linger in shadier and wetter areas during the hot and dry conditions of late summer, whereas cattle would not be grazed on the WMA past July (Figure 9).

Overall, this proposal is to enhance high-value wildlife habitats on the WMA and the adjacent McQueary Ranch. On the WMA, periodic managed cattle grazing would maintain structural diversity to the WMA, which can be attractive to a variety of game and non-game wildlife species for foraging or nesting. For example, some nesting birds, including long-billed curlews, prefer shorter vegetation for nesting and taller vegetation for rearing broods. On adjacent lands involved in the cooperative grazing system, additional rest periods would help restore or maintain the ecological integrity of grasslands, shrubs, and riparian habitats. Standing grass cover associated with rested pastures would be available for a variety of wildlife including seed and insect-feeding birds and mammals and wintering elk.

This proposal is intended to manage and enhance habitat on a small portion of the WMA by methods that leverage wildlife habitat enhancement on a larger footprint beyond the borders of FWP ownership.



Figure 9. Historically impacted portion of Spotted Dog Creek at the old Pauly Place, located downstream on Spotted Dog WMA and outside of the proposed WMA pasture area. This photo illustrates conditions on August 17, 2017, when wildfires burned in much of western Montana. Cattle would not be grazed on the WMA past July, when green forage can be restricted to riparian areas and wetlands.

FWP would commit to near-term and long-term levels of management and monitoring of this grazing project.

Near-term monitoring would be directed toward documenting that the terms of the grazing prescription are followed and to identify issues or concerns that need to be remedied right away while grazing occurs.

Long-term monitoring would be directed toward documenting the trend in native plant species composition and vigor, as well as riparian and wetland health. These parameters differ from measures of annual standing crop or other near-term effects by their persistence over several-years' time.

In the near-term, FWP would monitor annually to ensure that the rested sub-pastures on the included portions of both the WMA and the private land receive the prescribed yearlong rest for each year. FWP would document rest on the private land because rest from grazing on privately owned wildlife habitat is the enhancement that the private landowner would provide in lieu of a monetary payment to FWP for pasture rental.

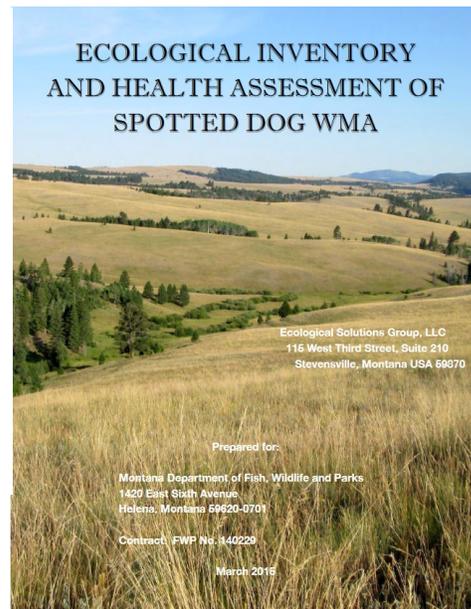
Also in the near-term, FWP would work with the McQueary Ranch on the grazed WMA sub-pastures to monitor a general impression of grazing intensity and the realized grazing capacity of the sub-pastures while cattle are on the property. Resource impacts would be identified and pasture boundaries adjusted as needed.

All near-term monitoring would be photo-documented.

In the long term, FWP would replicate the *Ecological Inventory & Health Assessment* (Hansen et al. 2015) on the plots that fall within the proposed pasture system on the WMA after the 6-year grazing project is completed (Figure 10).

Also in the long-term, FWP would install photo-plots on the McQueary Ranch pastures to identify gross-scale effects of the prescribed grazing and rest on the privately owned winter range.

Figure 10. Front cover of the Ecological Inventory and Health Assessment of Spotted Dog WMA by Hansen et al. 2015. The document is available for inspection at FWP Region 2.



One of FWP's criteria in selecting a private partner in cooperative grazing management is that they allow hunting on their ranch.

As applied under the circumstances pertaining to Spotted Dog WMA and Hunting District 215, FWP requires that the landowner allow hunting sufficient to prevent elk from concentrating on their property during the general hunting season and that they contribute to the overall harvest prescribed by FWP to meet elk population objectives.

The McQueary Ranch meets this criteria and proposes to continue allowing elk hunting access as they have in the past.

For the sake of accountability to the public for the use of public funds on this proposed grazing project, The Ranch would enter into a special access agreement with FWP, which would provide the public with a map and contact information for asking permission to hunt. The McQueary Ranch would handle the issuance of permission and scheduling of hunters themselves, as they have in the past.

The McQueary Ranch would commit to allowing at least 150 hunter-days of public access annually through the general hunting season, as has been their custom. Permission would be documented in writing, providing a record for review.

Draft Environmental Assessment CHECKLIST

Agency authority for the proposed action

FWP has the authority under state law (§ 87-1-201, Montana Code Annotated (MCA)) to protect, enhance, and regulate the use of Montana's fish and wildlife resources for public benefit now and in the future. FWP has the authority to lease lands for farming and grazing (§ 87-1-601, MCA) and to enter into leases in exchange for services to be provided by the lessee on the leased land (§ 87-1-209(7), MCA).

Management of Wildlife Management Areas is subject to Administrative Rules of Montana (ARM) under the Habitat Montana (Wildlife Land Acquisition) subchapter 12.9.5, ARM. A goal of the Habitat Montana Program is “implementation of habitat management systems that are compatible with and minimize conflicts between wildlife values and traditional agricultural, economic and cultural values” in a manner that is “compatible with the conservation of soil, water and existing biological communities” (12.9.509, ARM). ARM 12.9.510 seeks the following benefits: to “provide incentives for habitat conservation on private land” and to “promote habitat-friendly agriculture” and to demonstrate “that productive wildlife habitat is compatible with agricultural and other land uses.”

Anticipated Schedule

Public Comment Period: February 27–March 28, 2019

Decision Notice Published: April 1, 2019

Reviewed by FWP Fish and Wildlife Commission: April 25, 2019

Project Location

The Spotted Dog Wildlife Management Area is located within FWP Administrative Region 2 in the foothills of the Boulder Range northeast of Deer Lodge in Powell County, Montana (Figure 11).

Spotted Dog WMA Pastures

The proposed SDWMA pastures are in Powell County approximately eight miles northeast of Deer Lodge, Montana.

SDWMA pastures occur in all or part of the following sections:

Township 9 North, Range 8 West; Sections 34 and 35

Township 8 North, Range 8 West; Sections 2, 3, 4, 9, 10, 11, 14, 15, and 16

Private Land (McQueary Ranch) Pastures

The initial proposed private land pastures are owned by the McQueary Ranch and are located in Powell County approximately five miles east of Deer Lodge, Montana.

The private land pastures occur in all or part of the following sections:

Township 8 North, Range 8 West; Sections 22, 27, 28, 29, and 30

Spotted Dog WMA Cooperative Grazing System Pastures MONTANA FWP

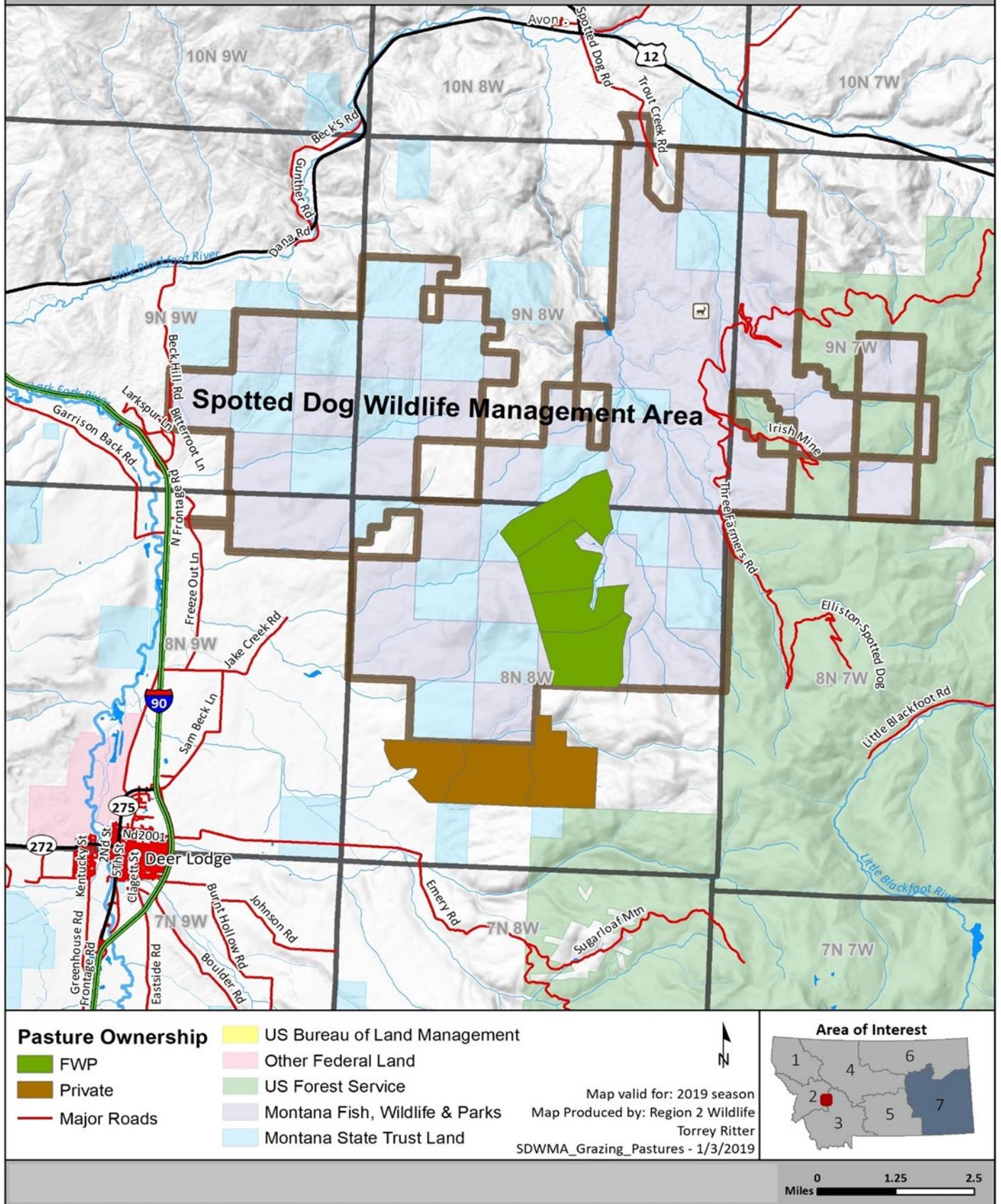


Figure 11. Landscape context for the proposed exchange of use cooperative grazing system on the Spotted Dog Wildlife Management Area and adjacent private lands in Powell County, Montana.

Spotted Dog WMA pastures = 2,762 ac.

	<u>Acres</u>		<u>Acres</u>
(a) Developed:		(d) Floodplain	<u>0</u>
Residential	<u>0</u>		
Industrial	<u>0</u>	(e) Productive:	
(b) Open Space/ Woodlands/Recreation	<u>2,708</u>	Irrigated cropland	<u>0</u>
(c) Wetlands/ Riparian Areas	<u>54</u>	Dry cropland	<u>0</u>
		Forestry	<u>252</u>
		Rangeland	<u>2,456</u>
		Other	<u>0</u>

Private land pastures = 2,102 ac.

	<u>Acres</u>		<u>Acres</u>
(a) Developed:		(d) Floodplain	<u>0</u>
Residential	<u>0</u>		
Industrial	<u>0</u>	(e) Productive:	
(b) Open Space/ Woodlands/Recreation	<u>2,055</u>	Irrigated cropland	<u>0</u>
(c) Wetlands/ Riparian Areas	<u>47</u>	Dry cropland	<u>1</u>
		Forestry	<u>456</u>
		Rangeland	<u>1,592</u>
		Other	<u>6</u>

Permits, Funding and Overlapping Jurisdiction

(a) **Permits:** none required

(b) **Funding:**

The proposed grazing system would require monetary contributions from FWP to construct and/or repair permanent SDWMA boundary fences. However, these fences are already being built and repaired as part of regular WMA maintenance. FWP would be responsible for the purchase of temporary electric fence materials to maintain cattle grazing in desired pastures during grazing treatments. FWP staff time would also be necessary to develop the grazing system and monitor WMA pastures before and after implementation of the grazing plan. The grazing system would require cooperating private landowners to construct and maintain fences on their lands to direct cattle grazing pastures scheduled for grazing. The grazing system would be regulated by detailed terms in a grazing lease agreement, agreed to and signed by cooperating agencies and landowners.

(c) **Other Overlapping Jurisdictional Responsibilities:**

Agency Name	Type of Responsibility
MT Department of Natural Resources and Conservation	project approval
FWP Fish & Wildlife Commission	project approval

Description and analysis of reasonable alternatives

Alternative A: No Action

Under the No Action Alternative, FWP would not implement a cooperative grazing system on Spotted Dog WMA. Grasslands outside of critical elk winter habitat on the WMA would continue to accumulate litter, would be less attractive to elk during the spring green-up period, and would lack the structural diversity that could be accomplished with periodic grazing treatments. Elk would likely continue to use spring and fall habitats on the WMA to a lesser extent than could be achieved through range management, contributing to ongoing game damage issues on private lands adjacent to the WMA. Additionally, grassland habitats on private lands would not enter into a grazing rotation that allows periodic rest for the purposes of enhancing wildlife habitat. FWP would retain funds that would be used to implement the grazing system, but would miss the opportunity to work collaboratively on grazing to accomplish wildlife habitat objectives.

Alternative B: FWP implements a cooperative grazing system on the WMA and adjacent lands

FWP would implement a cooperative grazing system on Spotted Dog WMA, with associated benefits as described earlier in this EA. FWP would be bound to implement, review, and update a grazing management plan (Appendix C) for the subject properties annually, or as needed, in cooperation with the enrolled landowner(s).

Evaluation of the impacts of the Proposed Action including secondary and cumulative impacts on the Physical and Human Environment.

A. PHYSICAL ENVIRONMENT

1. <u>LAND RESOURCES</u> Will the proposed action result in:	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Soil instability or changes in geologic substructure?			X			1a
b. Disruption, displacement, erosion, compaction, moisture loss, or over-covering of soil, which would reduce productivity or fertility?			X			1b
c. Destruction, covering or modification of any unique geologic or physical features?		X				
d. Changes in siltation, deposition or erosion patterns that may modify the channel of a river or stream or the bed or shore of a lake?			X			1d
e. Exposure of people or property to earthquakes, landslides, ground failure, or other natural hazard?		X				

1a. Introducing controlled cattle grazing to the proposed pastures in SDWMA would cause trampling and removal of vegetation by cattle in these areas. However, the considerable rest treatments (three years after grazing) would allow vegetation to recover and would help maintain considerable residue, protecting and building soils. Additionally, cattle trespass has been an on-going issue on SDWMA and having fencing and range riders on SDWMA would allow for more control over cattle grazing. The grasslands on SDWMA are well-adapted to grazing and are expected to respond favorably to controlled grazing with substantial periods of rest. Wetland and riparian areas that are particularly vulnerable to degradation by cattle are excluded from the proposed pastures.

1b. Cattle grazing can cause negative impacts to grassland systems when left unmanaged, including reduced productivity of grasslands. However, the considerable rest treatments (three years after grazing) of the proposed grazing system would prevent significant damage to these resources. Well-regulated cattle grazing is likely to increase productivity of the grassland habitats by periodically reducing litter, disturbing the soil while trampling seeds, and stimulating more vigorous plant growth during the early spring period. The exchange of use agreement would allow private rangelands that are currently experiencing heavy grazing and declining in ecological state to receive more rest which is expected to improve soil and plant conditions.

1d. Substantial riparian and wetland areas would be kept outside of the grazing units using temporary electric fence to minimize the impacts of cattle grazing on these habitats. Headwaters of several small streams would be used as water sources when cattle are in SDWMA pastures. Potential impacts to water sources would be minimized through a conservative stocking rate and providing three years of rest between grazing treatments. Nonetheless, small stream channels could experience some temporary impacts from cattle use and from increased elk use in transition ranges.

2. <u>AIR</u>	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
Will the proposed action result in:						
a. Emission of air pollutants or deterioration of ambient air quality? (Also see 13 (c).)		X				
b. Creation of objectionable odors?		X				
c. Alteration of air movement, moisture, or temperature patterns or any change in climate, either locally or regionally?		X				
d. Adverse effects on vegetation, including crops, due to increased emissions of pollutants?		X				
e. For P-R/D-J projects, will the project result in any discharge, which will conflict with federal or state air quality regulations? (Also see 2a.)		X				

The ambient air quality would not change if FWP implemented a cooperative grazing system on SDWMA. Motorized access to the grazing units would increase somewhat but would be minimal and mostly limited to established roads.

3. <u>WATER</u>	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
Will the proposed action result in:						
a. Discharge into surface water or any alteration of surface water quality including but not limited to temperature, dissolved oxygen or turbidity?			X			3a
b. Changes in drainage patterns or the rate and amount of surface runoff?			X			3b
c. Alteration of the course or magnitude of floodwater or other flows?		X				
d. Changes in the amount of surface water in any water body or creation of a new water body?		X				
e. Exposure of people or property to water related hazards such as flooding?		X				
f. Changes in the quality of groundwater?		X				
g. Changes in the quantity of groundwater?		X				
h. Increase in risk of contamination of surface or groundwater?		X				
i. Effects on any existing water right or reservation?		X				
j. Effects on other water users as a result of any alteration in surface or groundwater quality?		X				
k. Effects on other users as a result of any alteration in surface or groundwater quantity?		X				
l. For P-R/D-J, will the project affect a designated floodplain? (Also see 3c.)		X				
m. For P-R/D-J, will the project result in any discharge that will affect federal or state water quality regulations? (Also see 3a.)		X				

3a. and 3b. Cattle grazing in upland habitats on SDWMA may temporarily cause increased runoff of sediment and manure into nearby streams due to cattle presence, trampling of soils, and removal of vegetation. However, distributing scheduled grazing and rest treatments across a larger landscape is expected to be a net benefit to streams in the area because of additional grazing rest on private land pastures and substantial rest periods between grazing treatments on SDWMA.

4. <u>VEGETATION</u>	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
Will the proposed action result in?						
a. Changes in the diversity, productivity or abundance of plant species (including trees, shrubs, grass, crops, and aquatic plants)?			X			4a
b. Alteration of a plant community?			X			4b
c. Adverse effects on any unique, rare, threatened, or endangered species?		X				
d. Reduction in acreage or productivity of any agricultural land?		X				
e. Establishment or spread of noxious weeds?			X			4e
f. For P-R/D-J, will the project affect wetlands, or prime and unique farmland?		X				

4a. and 4b. Changes in the timing, duration, and intensity of cattle and elk grazing on SDWMA and adjacent lands could cause subsequent changes to these plant communities. On SDWMA pastures, periodic removal of litter and trampling of soils is expected to stimulate plant growth and change green-up timing. The identified stocking rate and substantial rest between grazing treatments is expected to keep the upland plant communities in a high ecological condition while allowing areas that were historically impacted by domestic grazing to continue to recover to higher ecological condition. On private land pastures, increased periodic rest from elk and cattle grazing would likely provide healthier range conditions and move the grasslands towards a more climax state with stable soils and a diversity of desired plant species. Due to the grazing system design, impacts to willows and shrubs from livestock grazing are expected to be minimized and temporary. Cattle would be removed from SDWMA before hot and dry conditions of late summer which often causes cattle to linger in shadier and wetter areas which can cause damage to willows and other shrubs, as well as riparian and wet meadow vegetation. Any given private land pasture would be grazed in one August-September period in every three years, which introduces rest to private pastures in two of every three years.

4e. Introducing controlled cattle grazing to SDWMA from private ranches lower in the valley would bring some risk of spreading noxious weeds into SDWMA pastures. However, cattle that would graze on SDWMA would come from the immediate area, and therefore the risk of introducing new invasive species onto the WMA would be low. WMA maintenance staff would conduct weed control operations on SDWMA pastures annually to control and monitor their establishment and spread. Participating landowners would conduct weed control operations on their properties that would minimize the spread of weeds into SDWMA. Additionally, SDWMA pastures would be monitored to identify areas of heavy cattle use, and actions to curtail those impacts would be taken. Actions may include use of cross-fencing to distribute grazing more evenly within pastures, moving of salt and mineral blocks to prevent formation of cattle trails and minimize heavily trampled areas, and re-assessment of cattle use of water sources to prevent over-use of these sensitive areas.

5. <u>FISH/WILDLIFE</u>	IMPACT					
	Un- know n	None	Minor	Potentially Significant	Can Im- pact Be Mitigated	Com- ment In- dex
Will the proposed action result in:						
a. Deterioration of critical fish or wildlife habitat?		X				
b. Changes in the diversity or abundance of game animals or bird species?			X			5b
c. Changes in the diversity or abundance of nongame species?			X			5c
d. Introduction of new species into an area?			X			5d
e. Creation of a barrier to the migration or movement of animals?			X			5e
f. Adverse effects on any unique, rare, threatened, or endangered species?		X				
g. Increase in conditions that stress wildlife populations or limit abundance (including harassment, legal or illegal harvest or other human activity)?			X			5g
h. For P-R/D-J, will the project be performed in any area in which T&E species are present, and will the project affect any T&E species or their habitat? (Also see 5f.)		X				
i. For P-R/D-J, will the project introduce or export any species not presently or historically occurring in the receiving location? (Also see 5d.)		X				

5b. The proposed grazing system would enhance spring green-up conditions on elk transition range on SDWMA and would likely cause some changes to the distribution of elk and other big game species where grazing treatments are proposed. More vigorous spring green-up is expected to cause elk to move to transition range earlier in the spring, providing rest on grasslands that comprise elk winter range, and is expected to cause elk to move to summer range later in the year, providing additional rest of summer range as well. Changes in seasonal elk and other big game movements and distribution are not expected to result in changes to the diversity or abundance of these species. There are few game bird species affected by the proposed action, but the grazing system is expected to cause either no change to ground-nesting birds or provide benefits through greater structural diversity of grasslands that provides a variety of options for foraging, nesting, and brood-rearing. Additionally, periodic removal of litter is expected to increase forb production that can lead to greater abundance and diversity of insects that birds rely on for food. Shorter grazed grasses can be attractive to some wildlife species for foraging and nesting (e.g., long-billed curlew, horned lark).

5c. Nongame species are likely to be the most heavily impacted by the proposed action, though significant negative effects are not anticipated. Small mammal species are resilient to cattle grazing and the substantial periods of rest from grazing are not expected to adversely affect small mammal communities. Small mammals are expected to benefit from increased rest on private lands that allows the grasslands to recover to a higher ecological state.

Raptors may have an easier time foraging in grazed pastures due to reduced litter cover and attraction of small mammals to increased forage quality and quantity. Songbird species that nest in grasslands may be displaced or experience lower nesting success in grazed pastures. However, adjacent rested pastures and ungrazed portions of the range are expected to provide plenty of nesting locations, and increased forage resources in grazed pastures should provide quality resources for young birds that hatched on adjacent pastures. Early season rest on private pastures is expected to allow more grassland birds to establish nests in those areas and move their young to other areas when cattle are brought in later in the summer.

Overall, improving the structural diversity of plants in these grassland systems is expected to provide greater habitat diversity across the project area that would improve grassland conditions for birds.

Amphibians that use wetter habitats on SDWMA and private lands may be displaced by use of the wet areas by cattle and elk, but there are very few of these types of habitats in the proposed pastures and most of the sensitive wetland and riparian habitats would be outside of the pasture units. Additionally, the proposed grazing system would allow greater exclusion of trespass cattle that would lead to a reduction in uncontrolled grazing impacts to these habitats. No reptile species are expected to be significantly impacted by the proposed action.

5d. Applying grazing treatments to SDWMA could bring brown-headed cowbirds (a prominent brood parasite) into an area where they may not otherwise be as active. The brown-headed cowbird may be especially relevant to willow and aspen communities adjacent to SDWMA pastures that generally have a high number of nesting songbirds. Because these wetland and riparian areas are relatively rare within the project area, the presence of livestock could have localized impacts on songbirds associated with wetland and riparian habitats. However, these impacts would be temporary and would be confined to a relatively small portion of the wetland and riparian habitats on the larger landscape.

5e. Fences can represent a barrier to movement for species such as elk and pronghorn. Much of the WMA pasture fencing is already in place and has been in place prior to FWP's purchase of SDWMA was purchased in 2010. Temporary electric fencing is expected to be easily passable by elk and other ungulates and so is not expected to substantially impact animal movements.

5g. The activity of ranchers and FWP staff in the project area while implementing the proposed grazing system would cause increased localized human disturbance that could temporarily displace or otherwise disturb individual animals or groups of animals. However, the timing of cattle moving into the WMA pastures would avoid the time of year when large groups of ungulates are congregated in the affected area. Similarly, the timing of cattle moving to private land pastures would coincide with most large mammal species being in forested, higher elevations areas. Moving cattle onto SDWMA during early June could displace nesting songbirds and small mammals on the treated grazing unit, but such disturbance would be localized and temporary.

B. HUMAN ENVIRONMENT

6. <u>NOISE/ELECTRICAL EFFECTS</u> Will the proposed action result in:	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Increases in existing noise levels?		X				
b. Exposure of people to severe or nuisance noise levels?		X				
c. Creation of electrostatic or electromagnetic effects that could be detrimental to human health or property?		X				
d. Interference with radio or television reception and operation?		X				

The proposed cooperative grazing system would not increase noise above levels currently experienced in the area. Some noise may be introduced to SDWMA through ATVs and trucks used to manage cattle operations, but these noise sources would be periodic and would not be expected to cause a major disturbance to humans or wildlife.

7. <u>LAND USE</u> Will the proposed action result in:	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Alteration of or interference with the productivity or profitability of the existing land use of an area?		X				
b. Conflict with a designated natural area or area of unusual scientific or educational importance?		X				
c. Conflict with any existing land use whose presence would constrain or potentially prohibit the proposed action?			X			7c
d. Adverse effects on or relocation of residences?		X				

7c. Introducing controlled cattle grazing to SDWMA could be perceived as in conflict with the wildlife habitat values the WMA system was meant to protect. However, the purpose of establishing grazing on the WMA is to fulfill specific wildlife habitat objectives that would benefit habitats on the WMA and on adjacent lands. The plant communities on SDWMA are adapted to grazing and FWP expects the proposed action would provide a net benefit to both area wildlife and landowners.

8. <u>RISK/HEALTH HAZARDS</u>	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
Will the proposed action result in:						
a. Risk of an explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation) in the event of an accident or other forms of disruption?		X				
b. Affect an existing emergency response or emergency evacuation plan, or create a need for a new plan?		X				
c. Creation of any human health hazard or potential hazard?		X				
d. For P-R/D-J, will any chemical toxicants be used? (Also see 8a)		X				

The proposed cooperative grazing system on SDWMA would not affect health hazards in the area.

9. <u>COMMUNITY IMPACT</u>	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
Will the proposed action result in:						
a. Alteration of the location, distribution, density, or growth rate of the human population of an area?		X				
b. Alteration of the social structure of a community?		X				
c. Alteration of the level or distribution of employment or community or personal income?		X				
d. Changes in industrial or commercial activity?		X				
e. Increased traffic hazards or effects on existing transportation facilities or patterns of movement of people and goods?		X				

The cooperative grazing system would have no effect on local communities, increase traffic hazards, or alter the distribution of the human population in the area.

10. <u>PUBLIC SERVICES/ TAXES/ UTILITIES</u>	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
Will the proposed action result in:						
a. Will the proposed action have an effect upon or result in a need for new or altered governmental services in any of the following areas: fire or police protection, schools, parks/recreational facilities, roads or other public maintenance, water supply, sewer or septic systems, solid waste disposal, health, or other governmental services? If any, specify:		X				
b. Will the proposed action have an effect upon the local or state tax base and revenues?		X				
c. Will the proposed action result in a need for new facilities or substantial alterations of any of the following utilities: electric power, natural gas, other fuel supply or distribution systems, or communications?		X				
d. Will the proposed action result in increased use of any energy source?		X				
e. Define projected revenue sources		X				
- f. Define projected maintenance costs.			X			10f

10f. Developing this habitat enhancement project on SDWMA would require the purchase of temporary and permanent fence materials, using existing WMA maintenance funds. Some permanent fence infrastructure would need to be installed or repaired to help support temporary electric fences. In addition, existing interior fences associated with this proposal would need to be maintained during the duration of this lease agreement. The lessee(s) would be responsible for erecting and taking down temporary fences and for maintaining permanent fences associated with the grazing system. FWP would be responsible for providing fence materials and assisting with initial construction of temporary fences to assure proper location and adjustment if needed due to unforeseen issues. The cost of new fence materials associated with this proposal is estimated to be approximately \$10,000.

11. <u>AESTHETICS/RECREATION</u>	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
Will the proposed action result in:						
a. Alteration of any scenic vista or creation of an aesthetically offensive site or effect that is open to public view?		X				
b. Alteration of the aesthetic character of a community or neighborhood?		X				
c. Alteration of the quality or quantity of recreational/tourism opportunities and settings?		X				
d. For P-R/D-J, will any designated or proposed wild or scenic rivers, trails or wilderness areas be impacted? (Also see 11a, 11c.)		X				

The proposed cooperative grazing system would not substantially impact aesthetics or recreational opportunities in the project area. Cattle would be removed from SDWMA well before the beginning of the Montana hunting season, and the proposed pastures do not encompass any fishable streams or ponds.

12. <u>CULTURAL/HISTORICAL RESOURCES</u>	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
Will the proposed action result in:						
a. Destruction or alteration of any site, structure or object of prehistoric historic or paleontological importance?		X				
b. Physical change that would affect unique cultural values?		X				
c. Effects on existing religious or sacred uses of a site or area?		X				
d. For P-R/D-J, will the project affect historic or cultural resources? Attach SHPO letter of clearance. (Also see 12.a.)		X				

FWP anticipates there would be no impact to cultural or historic resources if the proposed cooperative grazing system is implemented.

SIGNIFICANCE CRITERIA

13. <u>SUMMARY EVALUATION OF SIGNIFICANCE</u> Will the proposed action, considered as a whole:	IMPACT					
	Un-known	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Have impacts that are individually limited, but cumulatively considerable? (A project or program may result in impacts on two or more separate resources that create a significant effect when considered together or in total.)		X				13a
b. Involve potential risks or adverse effects, which are uncertain but extremely hazardous if they were to occur?		X				
c. Potentially conflict with the substantive requirements of any local, state, or federal law, regulation, standard or formal plan?		X				
d. Establish a precedent or likelihood that future actions with significant environmental impacts will be proposed?		X				
e. Generate substantial debate or controversy about the nature of the impacts that would be created?			X			13e.
f. For P-R/D-J, is the project expected to have organized opposition or generate substantial public controversy? (Also see 13e.)		X				
g. For P-R/D-J, list any federal or state permits required.		X				

13a. No secondary or cumulative impacts are anticipated if FWP were to implement a cooperative grazing system on SDWMA and adjacent private lands. Negative impacts identified in this EA are generally minor, localized, and temporary. FWP expects the benefits associated with the proposed action would outweigh identified impacts.

13e. There are individuals and organizations that do not support livestock grazing on WMAs. However, the scientific rationale for this project is well-founded and the benefits of carefully controlled livestock grazing to game and nongame wildlife are well-documented. FWP has considered the limited temporal impacts of livestock grazing described in this environmental analysis and weighed those against the anticipated wildlife habitat and secondary benefits, both on the SDWMA and on adjacent lands. Based on that analysis, it is the department's conclusion that the benefits of this proposal outweigh the localized negative impacts and costs. Consistent with these conclusions, FWP does not anticipate the proposed action would generate substantial controversy that would lead to requiring a more robust environmental analysis.

PART III. NARRATIVE EVALUATION AND COMMENT

The proposed exchange of use cooperative grazing system would allow FWP to enhance wildlife habitat on SDWMA and adjacent private lands leading to a more desirable distribution of elk and cattle in the project area. The grazing system seeks to improve habitat conditions for a variety of wildlife species on both public and private lands. The proposed action would also help facilitate more favorable relationships with private landowners bordering SDWMA, and work towards fulfilling management goals outlined in the 2017 Spotted Dog Wildlife Management Area Habitat Plan.

PART IV. EA PREPARATION

1. Based on the significance criteria evaluated in this EA, is an EIS required? No

If an EIS is not required, explain why the EA is the appropriate level of analysis for this proposed action.

No, an EIS is not required. Based on an evaluation of the primary, secondary, and cumulative impacts to the physical and human environment, no significant impacts from the proposed grazing agreement were identified. In determining the significance of the impacts of the proposed project, FWP assessed the severity, duration, geographic extent, and frequency of the impact, the probability that the impact would occur, or reasonable assurance that the impact would not occur. FWP assessed the importance to the state and to society of the environmental resource or value affected; any precedent that would be set as a result of an impact of the proposed action that would commit FWP to future actions; and potential conflicts with local, federal, or state laws. As this EA revealed no significant impacts from the proposed actions, an EA is the appropriate level of review and an EIS is not required.

2. Persons responsible for preparing the EA

Mike Thompson, FWP Regional Wildlife Manager, Missoula, MT

Torrey Ritter, FWP Nongame Wildlife Biologist, Missoula, MT

Kelvin Johnson, FWP Wildlife Habitat Biologist, Glasgow, MT

Julie Golla, FWP Area Biologist, Anaconda, MT

Rick Northrup, FWP Habitat Bureau Chief, Helena, MT

3. List of agencies or offices consulted during preparation of the EA

Montana Department of Natural Resources and Conservation, Anaconda, MT

Spotted Dog WMA Working Group, Deer Lodge, MT

Montana Fish, Wildlife & Parks:

Lands, Helena, MT

Wildlife, Helena, MT

Access, Missoula, MT

PART V. PUBLIC PARTICIPATION

Describe the level of public involvement for this project if any, and, given the complexity and the seriousness of the environmental issues associated with the proposed action, is the level of public involvement appropriate under the circumstances?

This proposal benefitted from a review and consideration of public comments received during the development of the *Spotted Dog Wildlife Management Area Habitat Plan (March 2018)*. Those public comments are attached in Appendix B. A working knowledge of issues and recommendations from members of the Spotted Dog Work Group also informed this proposal.

The public would be notified as follows, to comment on the proposal to use cattle grazing for managing elk habitat on a portion of the Spotted Dog WMA and neighboring private lands, including its draft environmental assessment (EA) and alternatives:

- A news release would be prepared and distributed to a standard list of media outlets interested in FWP Region 2 issues. This news release would also be posted on FWP Region 2's website <http://fwp.mt.gov/regions/r2/>.
- One legal notice would be published in each of these newspapers: *Anaconda Leader*, *Independent Record* (Helena), *Missoulian*, and *Silver State Post* (Deer Lodge).
- Copies of this EA would be available at the FWP Region 2 Headquarters in Missoula and the FWP State Headquarters in Helena.
- Copies of this EA would be mailed (or notification of its availability emailed) to neighboring landowners and other interested parties (individuals, groups, agencies) to assure their knowledge of the Proposed Action.
- Public notice on FWP's webpage: <http://fwp.mt.gov> ("News," then "Recent Public Notices"). The Draft EA would also be available on this website, along with the opportunity to submit comments online.

Copies of this EA may be obtained by mail from Region 2 FWP, 3201 Spurgin Rd., Missoula MT, 5980; by phoning 406-542-5540; by emailing shrose@mt.gov; or by viewing FWP's website <http://fwp.mt.gov> under Public Notices.

This level of public notice and participation is appropriate for a project of this scope having few physical and human impacts, many of which can be mitigated.

Public Comment Period

The public comment period will extend for thirty (30) days beginning February 27, 2019. Comments will be accepted until 5:00 p.m. on March 28, 2019. (Note: There was a delay in getting this EA out for public comment, so the original dates listed in the legal notices—February 22 through March 25, 2019—have been extended.) Comments can be made on the FWP's webpage (info above) or can be mailed to the address below:

Region 2 FWP
Attn: SDWMA Grazing
3201 Spurgin Rd
Missoula, MT 59804
or emailed to Sharon Rose at shrose@mt.gov

APPENDIX A:
Executive Summary
reprinted from the
Spotted Dog Wildlife Management Area Habitat Plan
March 2018

Spotted Dog
Wildlife Management Area Habitat Plan: March 2018

Spotted Dog Work Group



MONTANA FISH, WILDLIFE & PARKS

Executive Summary

This is a Habitat Plan (including Public Access)

This is the Habitat Plan for the Spotted Dog Wildlife Management Area (WMA). For the purposes of this Habitat Plan, public use of the WMA is considered part of the manageable environment to which soil, vegetation, fish and wildlife respond. So, the reader will find a section on Public Access, as well as sections addressing Native Species Diversity; Species of Concern; Elk Winter Habitat; Fisheries; Aspen, Wetlands & Riparian; Native Bunchgrass; Antelope Bitterbrush; Coniferous Forest; Invasive Plants (Weeds) and Infrastructure.

Montana's Elk Management Plan Pertains

This Habitat Plan does not specifically address elk population management; i.e., elk numbers, objectives, harvest and hunting regulations. Elk population management is addressed in the Montana Final Elk Management Plan (January 2005), separate from this Habitat Plan. Spotted Dog WMA is located in elk Hunting District (HD) 215; elk management objectives and strategies for HD 215 can be found under the heading of Deer Lodge Elk Management Unit (EMU) in the Montana Final Elk Management Plan. In 2008, Montana Fish, Wildlife & Parks (FWP) revisited the elk population objective for HD 215 with a working group of interested citizens, resulting in a proposal to up the objective from 1,000 to 1,400. The Montana Fish, Wildlife & Parks Commission adopted the higher objective in 2008.

In 2008, the elk count for HD 215 was 1,365 and at its objective. Two years later, FWP acquired Spotted Dog WMA. In 2013, the Spotted Dog Work Group formed to work with FWP on issues related to the WMA. From 2009 to 2017 the elk count for HD 215 rose to 2,850, double its objective.

The Work Group and FWP understand that no matter its management, the WMA cannot feasibly attract enough elk from neighboring ranches to alleviate elk damage at these high elk numbers. Therefore, habitat management—the topic of this Habitat Plan—cannot substitute for elk harvest and population management, which is already directed by the Montana Final Elk Management Plan and must be addressed accordingly. These facts do not preclude livestock grazing as a tool for enhancing wildlife habitat on portions of the WMA and on private lands in a cooperative habitat management agreement.

Roles of FWP, the Work Group & the Public

FWP is responsible for managing Spotted Dog WMA in keeping with the goals for acquiring and maintaining it with dedicated public funds. Therefore, all citizens have a voice in WMA management.

FWP and the Spotted Dog Work Group collaborated to prepare a draft Habitat Plan for broader public review. The Work Group is comprised of 18 citizens, mostly from the area local to the WMA, representing landowners, sportspeople, government, education and other interests. The Work Group formed in 2013 and its meetings (~30 to date) are open to the public.

FWP advertised the draft plan's availability for public review and comment from 8 Nov. to 8 Dec. 2017, and held a public meeting in Deer Lodge on 30 Nov. 2017. Comments are preserved in Appendix H of this final Habitat Plan for continuing reference and consideration.

Formal public involvement as directed under the Montana Environmental Policy Act (MEPA) will be solicited if and when specific habitat projects outlined in this Habitat Plan are proposed in the future. Such projects would include livestock grazing on the WMA, a revised travel management plan, and land transactions, to name a few.

Purpose & Goals (page 8)

FWP acquired and established the Spotted Dog WMA on September 2, 2010. The goals of the purchase, as listed in FWP's grant application to the Natural Resource Damage Program (NRDP), were to protect priority fish and wildlife resources; enhance critical winter habitat for elk and mule deer; maintain migratory patterns to and from the National Forest for a regionally significant elk herd; provide lasting public access to previously inaccessible lands; maintain landscape connectivity between the Blackfoot and Clark Fork watersheds; and to replace lost and injured natural resources that were the subject of *Montana v. ARCO*.

The Work Group developed and adopted the following Guiding Principles for preparing the draft Habitat Plan:

1. The primary purpose of the Spotted Dog WMA is to benefit wildlife and fish habitats, and natural resources on behalf of the general public.

2. Actions will be sustainable for future generations.
3. Provide access for a wide variety of uses consistent with the management plan.
4. Be a good neighbor with the landowners and the residents of Powell County.

Area Description (pages 9-26)

Spotted Dog WMA covers 37,877 acres in south Powell County, with 27,616 acres deeded to FWP and 10,261 acres leased from the Montana Department of Natural Resources and Conservation (DNRC). Herein, we divided the WMA into five Management Units (MU) for planning purposes. Each MU generally corresponds with one principal drainage system and access route. The MUs also generally reflect broad distinctions of vegetation and wildlife.

The MUs present differing challenges of management. The O'Neill Creek MU (MU-1) contains the primary public access point to the WMA from the Deer Lodge side of the property, via Freezeout Lane; includes the Rocky Ridge communications site and the BPA 500-KV powerline; and is bordered by a residential area along Beck Hill Road. MU-1 and the Freezeout-Jake MU (MU-2) border ranches along the Old Stagecoach county road, which has been closed to public access in recent decades. Public access to MU-2 from the Jake Creek Road is also currently closed where the road crosses private land before reaching the WMA. The Spotted Dog MU (MU-3) also borders private ranches along the track of the Old Stagecoach Road, and includes the old Pauly Place buildings and corrals, as well as Spotted Dog Reservoir. Public access is available to the Trout Creek MU (MU-4) from Avon, continuing into MU-3. A groomed snowmobile route runs across MU-4 and the Forested Checkerboard MU (MU-5) from Avon to Elliston. MU-5 and part of MU-4 are unfenced against an active livestock allotment on the Helena National Forest. Whereas the other MUs will be managed with an eye toward the larger rangeland and riparian landscape, MU-5 will be managed with an awareness of its contribution as part of the larger coniferous forest.

Land Use History (page 16)

The property now known as Spotted Dog WMA has a long history of ranching, involving cattle and in earlier years, sheep. Under the purchase agreement (dated July 28, 2010) by which FWP acquired the WMA property from the Rock Creek Cattle Company (RCCC), it was agreed that RCCC would retain limited grazing rights on the WMA through December 31, 2012. At the request of RCCC, the Montana Fish, Wildlife & Parks Commission subsequently extended that grazing agreement through 2013. From 2014 forward, FWP has provided rest from livestock grazing as outlined in its Management Plan and the Livestock Grazing Amendments to the Plan contained in the Decision Notice for the purchase of Spotted Dog WMA (August 2010). Livestock trespass continues across the WMA's unfenced boundary with the Helena National Forest.

Ecological Inventory & Health (pages 27-28)

Hansen et al. (2015) characterized the soil, water and vegetation of FWP deeded lands across 90% of Spotted Dog WMA. Upland grasslands are in the best condition, and the best of the best are concentrated in the northernmost sections of MU-4. Conversely the problem area for upland grassland, shrubland and wetland environments is in western MU-1.

Despite the unhealthy and non-functional condition of some uplands in MU-1, O'Neill Creek ranked highest in ecological condition among streams, with an overall health rating of 79%. The MU-2 streams came second in order of ecological condition, with Fred Burr Creek at 74%, Freezeout Creek at 65% and Jake Creek at 61%. MU-3 followed with Spotted Dog Creek at 62%. Trout Creek, in MU-4, ranked last in stream health (54%).

Monitoring (pages 29-30)

The ecological inventory and health assessment (EIHA) by Hansen et al. (2015) offers a repeatable framework for future ecological monitoring. FWP will plan to repeat the EIHA by 2025 to monitor the condition and trend of vegetation under the influence of this Habitat Plan. Inherent in the repeated EIHA is a check for changes in noxious weed distribution. Photo points will be established to monitor representative habitats that are featured in this plan at more frequent intervals between replicates of the EIHA.

Maintenance activities on the WMA will be compiled in an annual report, including weed control, fence repair and other activities. Fish and wildlife surveys will be scheduled as needed in accordance with regional information priorities.

Prescribed management treatments, such as livestock grazing, fence construction and forest management, will be monitored during the periods while those treatments are occurring on the land to assure compliance with prescriptions and to identify adjustments that may be needed.

Invasive Plants (Weeds) (pages 31-32)

MU-1 had the highest proportion of sampling plots (51%) with >10% coverage of invasive species, followed by MU-2 (31%), MU-4 (26%) and MU-3 (21%) (Hansen et al. 2015). Twenty-two invasive plant species were identified on the WMA, with cheatgrass covering the most acres (632) and spotted knapweed ranking second (437 acres). Weed management objectives and strategies are addressed where they pertain under the resource headings/priorities (e.g., Native Species Diversity, Elk Winter Habitat, etc.) in this Habitat Plan.

- ◆ A weed management strategy common to every resource priority is to make a habit of documenting and treating new weed occurrences while driving roads, fixing fences and in the course of other duties on the WMA.
- ◆ Comply with FWP's Statewide Weed Plan and the Powell County Weed Plan. Encourage the public to report changes in weed species and distribution.
- ◆ Work with Powell County to develop a WMA weed map.

Executive Summary

Part of a Larger Whole (pages 33-34)

Cooperation is essential to achieve compatible management of fish and wildlife habitat across the larger landscape, of which the WMA is but a part. It will be a priority to budget for the time commitment required to work thoughtfully and effectively with our neighbors. For that purpose, FWP employs a decentralized operational structure. Locally-based professionals are vested with the delegated authority to speak and act on behalf of FWP, and are charged with becoming part of their local communities.

Native Species Diversity (pages 35-36)

Direction: Enhance the food web, focusing on the base of the energy pyramid: soil health, litter, native forbs, pollinators and the like.

Base Budget Items and Work Priorities:

- ◆ Prevent new weed establishments with early detection and eradication.
- ◆ Where herbicide is needed to control weeds, spot-spray whenever possible rather than broadcast spray, and use the most selective herbicide for the job.
- ◆ Watch cheatgrass distribution and avoid creating niches for cheatgrass expansion.
- ◆ Maintain boundary fences to minimize livestock trespass.
- ◆ Consider prescribed cattle grazing to enhance structural diversity in grasslands.
- ◆ When grazing, limit grazing impacts during the nesting season and/or rotate treatments.
- ◆ Allow litter to develop and decay in grassland communities where litter should accumulate.
- ◆ Prevent off road vehicular travel.
- ◆ Recruit and retain large snags in forests.

Priorities for Special Projects when Feasible:

- ◆ Consider forest restoration treatments to foster the recruitment of naturally occurring stand characteristics in historically harvested stands.
- ◆ Develop forest management treatments to manage the risk of stand replacement events.
- ◆ Remove conifer encroachment in grasslands, aspen, and wetlands as appropriate.

Species of Concern (pages 37-38)

Direction: Reverse population declines for Species of Concern.

Base Budget Items and Work Priorities:

- ◆ Maintain native species diversity in healthy habitats, and work to restore species diversity in degraded habitats. Native species diversity includes managing native plant communities to support species-rich native animal communities including songbirds, raptors, reptiles, amphibians, small mammals, and insects.
- ◆ Riparian, wetland, and aspen communities support the highest wildlife species diversity, so those communities need to be managed with special care to ensure their protection and enhancement on the WMA.
- ◆ Maintain and/or restore populations of Species of Concern that are naturally found in WMA habitats.
- ◆ Explore ways for the public to view and learn about wildlife, while minimizing impacts to wildlife and plants.

Elk Winter Habitat (pages 39-40)

Direction: Prioritize Elk Winter Habitat in MUs 1 & 2.

Base Budget Items and Work Priorities:

- ◆ Maintain fences to minimize livestock trespass and reserve forage for wintering elk.
- ◆ Identify and eradicate first occurrences of new weed species or weeds in new places.
- ◆ Watch cheatgrass distribution and avoid creating niches for cheatgrass expansion.
- ◆ Coordinate closely with communications towers maintenance and powerline right-of-way maintenance.
- ◆ Retain forest stringers and thickets.
- ◆ Close WMA to the public from December 2-May 15.
- ◆ Control hunting access if hunting is needed during winter to achieve elk harvest goals, while minimizing disturbance to elk on their winter range.

Priorities for Special Projects when Feasible:

- ◆ Forest management will employ a light touch as needed in MU-1 and MU-2, if at all, to extend the function of small-acreage stands into the future and to manage risk.

Aspen, Wetlands & Riparian (pages 41-42)

Direction: Recover or restore aspen, wetland and riparian systems

Base Budget Items and Work Priorities:

- Protect aspen, wetland and riparian areas from noxious weeds as a focus of overall weed management efforts.
- Protect these areas from unauthorized livestock.
- Avoid and correct road, culvert and sediment impacts.
- Prevent damage from off road vehicles.
- Manage conifer encroachment in aspen.
- Protect beaver on Spotted Dog WMA.
- Recruit and protect snags, especially deciduous spp.

Priorities for Special Projects when Feasible:

- Plant native riparian vegetation (i.e., willows).
- Prescribe more extensive forest management and conifer treatment to rejuvenate aspen.
- Consider redistributing beaver at such time as the forage base would support beaver.
- In the absence of beaver, consider mimicking beaver activity with instream structures.

Fisheries (pages 43-44)

Direction: Enhance habitat for native westslope cutthroat trout.

Base Budget Items and Work Priorities:

- Protect streambanks from noxious weeds to minimize sediment delivery to streams.
- Protect streams from livestock impacts.
- Avoid and correct road, culvert and sediment impacts.
- Prevent damage from off road vehicles.

Priorities for Special Projects when Feasible:

- Utilize active stream restoration to address habitat degradation and channelization.
- Plant woody riparian vegetation where absent due to past land use practices.
- Remove or resize stream crossings (e.g., culverts).

Native Bunchgrass (pages 45-46)

Direction: Maintain climax rough fescue stands where they currently exist, and manage for soil stability and a healthy

mix of native increasers and decreasers in bunchgrass vegetation types overall.

Base Budget Items and Work Priorities:

- ◆ Maintain fences to minimize livestock trespass.
- ◆ Identify and eradicate first occurrences of new weed species or weeds in new places.
- ◆ Watch cheatgrass distribution and avoid creating niches for cheatgrass expansion.
- ◆ Consider prescribed cattle grazing to add vegetation community structure in grasslands other than designated rough fescue reference sites, and as a tool for achieving grazing improvements on privately owned bunchgrass communities as well.
- ◆ Confine motorized traffic to open roads.

Priorities for Special Projects when Feasible:

- Restore native communities on sites dominated by cheatgrass on a prioritized basis, pending the development of sound methodologies for cheatgrass control.
- Develop interpretive signage to increase the public's appreciation for native grasslands and their management.
- Remove conifer encroachment.

Antelope Bitterbrush (pages 47-48)

Direction: Reserve antelope bitterbrush stands for their unique wildlife habitat qualities.

Base Budget Items and Work Priorities:

- ◆ Maintain fences to minimize livestock trespass.
- ◆ Identify and eradicate new weeds or weeds in new places.
- ◆ Watch cheatgrass distribution and avoid creating niches for cheatgrass expansion.
- ◆ Use biological controls or spot spray with the most selective herbicides to avoid damage to bitterbrush while addressing noxious weeds in MU-1 and MU-2.
- ◆ Keep elk numbers in balance.
- ◆ In MU-1 and MU-2 discourage public camping and prohibit fires.
- ◆ Limit motorized access to few well worn roads.

Priorities for Special Projects when Feasible:

- ◆ Monitor bitterbrush condition and trend over time.
- ◆ Monitor wildlife use in bitterbrush.
- ◆ Develop interpretive signage to help the public appreciate bitterbrush and its value.
- ◆ There may be a need at some point to intensively treat cheatgrass in bitterbrush stands, pending development of effective cheatgrass control methods.

Executive Summary

Coniferous Forest (pages 49-50)

Direction: Coniferous forest makes up about 15% of the lands deeded to FWP within Spotted Dog WMA. Most of it lies within MU-5, intermingled in the Helena National Forest, and is largely cutover, having been harvested shortly before the property was acquired by FWP. In the near term, forest management on Spotted Dog WMA will be limited, as follows:

Base Budget Items and Work Priorities:

- ◆ Eradicate new weed species or weeds in new places.
- ◆ Protect snags and snag recruits.
- ◆ Prohibit wood cutting for offsite use.

Priorities for Special Projects when Feasible:

- ◆ Inventory the forest.
- ◆ Develop a forest management plan that focuses on regeneration of a healthy forest structure.
- ◆ Treat forest disease issues as they arise and take any preventative actions identified in the forest plan.

Public Access (pages 51-54)

Direction: Offer access to appreciate fish and wildlife, and to effectively balance wildlife with their habitat.

Base Budget Items and Work Priorities:

- ◆ Maintain open roads to WMA statewide standards.
- ◆ Enforce road closures and other user regulations to lessen user conflicts and resource damage.
- ◆ Manage hunter access to provide the publicly desired hunting experience and manage wildlife populations.
- ◆ Allow over-the-snow access on USFS Road 314.
- ◆ Maintain the winter closure to limit human disturbance of wintering elk and deer, with any exceptions as may be required to manage wildlife populations.
- ◆ Maintain effective signage, focusing on identifying property boundaries to prevent trespass on neighboring lands.
- ◆ Enact fire season restrictions with interagency collaboration.
- ◆ Develop and maintain updated travel maps, regulations and information online and on paper for distribution.

Priorities for Special Projects when Feasible:

- ◆ Develop portal/entrance signage.
- ◆ Develop a trail system, pending definition and funding.
- ◆ Identify designated camping areas if needed in the future, but avoid installing campground developments.

Interpretive Resources (pages 55-56)

Direction: Develop interpretive signage and other informational materials to enhance the public's appreciation of their WMA.

Base Budget Items and Work Priorities:

- ◆ Design and install a large-panel highway sign, to be placed along Highway 12 or other appropriate highway location, to inform the public about Spotted Dog WMA and identify its funding sources and purposes.
- ◆ Work with Audubon and local birders to develop a bird list and birding brochure for Spotted Dog WMA.
- ◆ Work with local historians to uncover and interpret the history of the Spotted Dog area.

Priorities for Special Projects when Feasible:

- ◆ Develop interpretive signage, recognizing that it is vulnerable to vandalism in remote locations.
- ◆ Develop a trail system involving low-profile interpretive signage and/or brochures. Consider a diversity of travel types, including motorized travel routes on the established open road system, as well as trails for nonmotorized use.

Infrastructure (pages 57-58)

Direction: Establish mutually beneficial property boundaries, facilities and improvements.

Base Budget Items and Work Priorities:

- ◆ Communicate routinely and effectively with Powell County, DNRC, USFS and neighbors.
- ◆ Cooperate with all affected parties on the Old Stagecoach Road issue.
- ◆ Work with DNRC on leases of DNRC lands to FWP.
- ◆ Work with private neighbors on fences, weeds, property exchanges, and trailing livestock across the WMA.
- ◆ Work with USFS on management of intermingled parcels.
- ◆ Prepare an annual report of maintenance activities.

Priorities for Special Projects when Feasible:

- ◆ Construct new boundary fences where still needed.
- ◆ Develop portal/entrance signage.
- ◆ Identify designated camping areas if needed in the future, but avoid installing campground developments.
- ◆ Work on proposing land transactions and public involvement to block up FWP ownership within the WMA.

APPENDIX B:

Public Comments reprinted from the Spotted Dog Wildlife Management Area Habitat Plan

FWP and the Work Group offered this Habitat Plan for the Spotted Dog Wildlife Management Area for public comment from 8 November to 8 December 2017, and also obtained comments at a public meeting in Deer Lodge on November 30, 2017. Appendix H [of the *Spotted Dog WMA Habitat Plan*] contains the substance of those public comments for future reference and consideration as the plan is implemented.

Comment	Name
<p>1 Pleased to see you realize the importance of allowing access along the old county road that runs through this area. Historical information concerning Mullan Road and the Indian trail needs to be documented which requires access to the area. I have spent several days covering some of this ground on a bicycle and would appreciate being able to use a pickup or an atv for the longer stretches from access points. I have found the Indian trail and original road vary in location from the more modern "Stage" road in many places.</p> <hr/> <p>I am anxious to see the results of your management plan.</p>	<p>Little, Gary</p>
<p>2 Manage for wildlife, sportsman access and opportunity first and foremost. Any other activities (such as livestock grazing) should be secondary and only considered if shown to be a benefit to wildlife habitat.</p>	<p>Foster, Aaron</p>
<p>3 The Big Sky Upland Bird Association (BSUBA) has been organized for over 30 years as a non-profit organization in Montana dedicated to habitat conservation and hunting opportunity for all upland game bird species in the state. We are supportive of MDFWP's stated goals of managing habitat of the Spotted Dog WMA (SDWMA) for the benefit of wildlife, habitat and species diversity, and wildlife related recreation. At nearly 60 square miles, the SDWMA has the potential to provide high quality hunting for a variety of species, and a significant number of hunter-use-days.</p> <hr/> <p>However, we note that while there was assessment of songbird diversity on the SDWMA, there is only very limited discussion of the upland bird species of the SDWMA, and no measures explicitly designed to conserve or enhance upland gamebird habitats or populations. We find this a significant oversight given that upland birds such as Ruffed Grouse, Dusky Grouse, Merriam Turkey, Gray Partridge, and potentially Sharp-tailed Grouse, could use and thrive on this important tract of intermountain grassland habitat. It should be anticipated that the region's upland bird hunters will use the property extensively.</p> <hr/> <p>Regarding habitat, all grouse species would benefit from management to enhance aspen stands and shrub such as willow, birch, chokecherry, rose and serviceberry. Dusky grouse and turkey would benefit from management for some old growth Douglas fir and Ponderosa pine for winter and roosting habitats. As ground nesters, all upland game birds would benefit from management for residual native grass cover, habitat features influenced by both elk population objectives and livestock grazing intensities.</p> <hr/> <p>Related, we commented this August regarding the control of conifer expansion and native grassland restoration across nearly 3,000 acres of the Blackfoot Clearwater Wildlife Management Area (BCWMA), because of the high potential for the project to increase the preferred habitat (conifer-free grasslands) for Sharp-tailed Grouse (<i>Tympanuchus phasianellus</i>). BSUBA has been engaged for several years with MDFWP staff in efforts to plan for, and ultimately implement, restoration of Plains Sharp-tailed Grouse to western Montana's valleys. The upper Blackfoot Valley was the last known location supporting a breeding population in western Montana until 2000 (Deeble 1996). A new plan to reestablish Sharp-tailed Grouse in western Montana has identified evergreen tree encroachment into grasslands as the principle ecological barrier to sharptail reestablishment (McNew et al. 2017). The Blackfoot Valley near Helmsville could become a primary reintroduction area, and the grasslands at the Spotted Dog WMA only thirty miles to the southeast, if conifer expansion is controlled, would also support reestablishment and connectivity of this highly mobile grouse species to historic range and to extant populations eastward near Helena.</p>	<p>Deeble, Ben</p> <p>Big Sky Upland Bird Association (BSUBA); president</p>

It should also be noted that any habitat enhancement projects which benefitted upland birds on the SDWMA could potentially be funded with monies from FWP's Upland Game Bird Habitat Enhancement Act, a pool of funds generated by the sale of upland bird hunting licenses.

Clearly any final habitat management plan for the SDWMA would benefit from expanded evaluation and discussion of upland bird habitats, populations, and management direction compatible with maintaining and enhancing habitats and hunting opportunity for upland bird species.

References:

Deeble, B. D. 1996. Conservation of Columbian sharp-tailed grouse, with special emphasis on the upper Blackfoot Valley, Montana. University of Montana, Missoula, MT. 70 pp.

McNew, L.A. 2017. Restoration Plan for Sharp-tailed Grouse Recovery in Western Montana, May 2017. Montana State University, Bozeman MT. 99 pp.

- 4 The major flaw in this plan is the repeated references to the use of cattle grazing to "improve forage conditions for wildlife". This theory is 95% B.S. Grazing is not a tool it is always problem. It is amazing to me that in spite of the report from Hansen which documents the damage done by years of abusive cattle grazing to this landscape that anybody would continue to push this crackpot theory that somehow livestock is beneficial to wildlife.

The people of this state do not want public money spent to buy another damn livestock pasture. W.M.A.s should be managed for **wildlife**.

The report states: "maintain fences to minimize livestock trespass", "keep livestock out of riparian areas", "protect bitterbrush from livestock grazing", "In Alberta, succession to a near climax state of rough fescue requires more than 20 years of rest after disturbance by intense grazing." The best way to achieve these goals is **no grazing!**

In order to accommodate livestock, interior fencing would be needed that is expensive and creates problems for wildlife movement.

It would be nice to be able to recreate on public lands without tripping over cow pies.

Prohibit trapping and introduce beaver.

And finally, **NO LIVESTOCK!**

- 5 Although it has taken almost seven years for FWP to get to the point of proposing a formal management plan for this WMA we are supportive of the process that has gotten us to this point. We are especially pleased that the EIHA by Hansen was completed prior to any effort to develop a plan. The management of this WMA should be guided by the science documented in this report.

Frasier, Stan
Marchion, Chris; Anaconda Sportsmen Club

While we have a lot of agreement with the contents of the proposed plan our disagreements have to do with the departure from science and departure from FWP standards.

While we could be convinced that grazing by domestic livestock on the WMA maybe a part of a management plan we are concerned by a lack of safeguards for the WMA. The EIHA identified areas which should never be grazed as well as substantial areas that would need complete rest for periods of as much as 20 years. We would oppose any livestock use on any of those identified areas until there is scientific evidence that grazing is now appropriate.

In addition any domestic grazing on the WMA should provide a primary benefit to the wildlife objectives of the WMA and not for economic incentives or pressure to satisfy agricultural interests.

The plan has a good discussion about the viability and availability of a number of fish and wildlife species with the exception of ungulates which only seems to consider elk, which are abundant. We urge equal consideration for antelope, deer, and moose. In HD 215 there appears to be a long term problem with the quantity and age structure of mule deer. While this problem is unlikely to be related to habitat we need to make sure we use this property to contribute to the long term solution of this problem and not in a manner that aggravates the situation.

The plan suggests that shoulder hunts may be considered to address the elk overpopulation in HD215. We absolutely object to any such consideration. A primary reason for the WMA is to provide a safe place for wildlife during critical habitat needs and reduce conflicts from wildlife on private lands. Late season hunts are contrary to this objective.

We support the objectives to protect and enhance the existing pure strain cutthroat populations, even if this comes at the expense of reducing non-native species.

We urge the removal of any existing interior fencing which is no longer of value and presents a liability to the movement of wildlife on the WMA.

We look forward to the completion of the external fencing to keep out trespass livestock especially since it is exasperating the recovery of the WMA.

Because the travel plan is new and opportunities for changes are limited, we do not have any comments at this time. We suggest we review travel as we can determine the public's needs balanced with wildlife security. This won't be known until the public's interest in access has developed further and the wildlife adjust to a restored and secure landscape.

- 6 Montana Backcountry Hunters and Anglers (MT BHA), representing over 1000 Montana resident hunters and fishermen, is pleased to have the opportunity to participate by providing comments to the recent Draft Spotted Dog Wildlife Management Habitat Plan 2017. Because MT BHA values both the resources and the management direction, we have previously commented management re Spotted Dog WMA (10/29/13, 11/29/13, 2/14/16, 10/3/16, 10/18/16, and 7/25/17) and have occasionally attended the meetings of the Advisory Committee. We are deeply committed to a Plan that optimizes wildlife and fishery resources on a sustainable basis.

Munther, Greg; Montana Backcountry Hunters and Anglers; board members

We support many of the aspects of this Draft Plan. We agree with the Purpose and Need, the Statewide Goals, and the Goals specific to the WMA. It is important for the Plan to clearly reflect in management direction that the Purpose of the purchase of Spotted Dog WMA was to replace lost or injured natural resources via Montana vs ARCO, and to permanently protect fish and wildlife resources. We wish to clarify that this WMA, based on the stated rationale for purchase, needs to protect all native fish and wildlife species and resources, not just elk and deer.

We note that the last official look at the Elk Management Objective number was in 2008 but in 2010 the public took ownership and designated FWP to manage nearly 40,000 acres of the primary winter range for elk. It would therefore seem appropriate as part of a Habitat Plan that FWP calculate the now-public Spotted Dog WMA's carrying capacity for elk. That WMA carrying capacity, when combined with carrying capacity for other public winter ranges in the appropriate herd units would be an important element in future discussions re appropriate elk management objectives. We are assuming that past grazing impacts under private ownership reduced carrying capacity for elk and other species on Spotted Dog, but that an improved management strategy and decisions should increase present capacity for elk and deer, as well as other species, while reducing conflicts with adjacent private lands.

We request that riparian areas, including seeps and springs, given their unique vegetative composition and disproportionate value to fish and wildlife, be separated into a separate management unit, with separate management direction.

We are appreciative of the past decision to complete a high quality vegetative and condition inventory and analysis using Dr. Paul Hansen. Projected and subsequent monitoring of vegetative composition and condition should be part of the equation for any proposed management action that could negatively alter plant composition or condition.

It is important to state in the Plan why you are proposing to focus on beaver restoration. We assume you have highlighted beaver because they serve as a restorative tool and keystone species for many aquatic and terrestrial species, but this rationale is not so stated in the Draft.

The State Lands inholdings in the WMA are a unique issue that compounds management and increases management costs, and the recent efforts to resolve these in the recent land purchase proposal is appreciated. We support this proposal and hope this purchase will be successful. It also may be worthwhile to identify private lands in and around the WMA that would improve management for both FWP and private landowners if exchanges or purchases for those lands could occur.

The Draft's stated potential for WMA livestock grazing is perhaps the "elephant in the room" that needs considerably more explanation and clarity as part of this Plan. While we do not object to specific livestock grazing for site specific purposes, priority for this WMA must be sustainable habitat for all species of fish and wildlife first.

What specifically is intended by “Consider prescribed cattle grazing to add vegetative community structure in grasslands other than designated rough fescue reference sites, and as a tool for achieving grazing improvements on privately owned bunchgrass communities as well”?

At what scale is grazing intended across the WMA?

What current plant community condition would trigger grazing on the WMA?

What is the target plant community structure that grazing would promote that cannot occur with-

Because domestic livestock grazing is often attributed to creating conditions to the spread and dominance of cheatgrass, how will grazing be managed to be consistent and not in conflict with the priority direction “*Watch cheatgrass distribution and avoid creating niches for cheatgrass expansion*”? *It should be noted that P Hansen’s plant evaluation documented cheatgrass has already infested each of the management units to varying but significant degrees. Although MU 1 may have the greatest density of cheatgrass, the other Management Units have sufficient density and distribution to explode if disturbance occurs. Both grazing and fire are primary mechanisms for accelerating the spread of cheatgrass. A similar issue is present with the widespread distribution of knapweed. Considerable analysis of the short term vegetative condition weighed against the potential for permanent degradation of native grasslands via invasive species must be an upfront and deliberate decision as part of this Plan.*

Because all species of wildlife are important on the WMA, how would predators on the WMA be treated in the presence of livestock predation? Would presence of livestock and associated activities modify the presence, density and distribution of predators? If so, the Plan should address how livestock/predator conflicts would be resolved.

The justification for livestock grazing of the WMA appears to be, in part as “*a tool for achieving grazing improvements on privately owned bunchgrass communities as well*”. *Specifically, what privately owned bunchgrass communities need improvement? Will there be measurable contract obligations with a WMA grazing permittee to achieve specific grasslands improvement results on their lands and how would that be evaluated? Will measurable contractual long term hunter access be part of any agreement with a grazing permittee? How, and under what conditions would a permittee be selected to graze the WMA? Would past livestock trespass issues*

Monitoring (p 30) references use of “*pastures*”. *This leads us to believe FWP envisions regular large scale grazing on the WMA. If this is true, what is the scale of these “pastures” and where are they to be located? Does reference to “rotate treatments” (p 35) refer to rest-rotation grazing system? If so the Plan should so state each grazed area’s plant community goals and explain how this treatment plans to achieves those goals and what evaluation process and monitoring frequency will be used.*

If grazing infrastructure, other than WMA boundary fences, is envisioned, would sportsmen or other public funding be used to construct or maintain these fences or water developments? We would advocate instead, if the decision to graze moves forward, advocate for temporary electric fences and portable water tanks provided by the permittee with the responsibility for containing livestock solely up to the permittee, and that renewal of any grazing permit be premised on sat-

We support completion and maintenance of the WMA boundary fence as the only viable way to

“Healthy with problems” was a common diagnosis by P. Hansen for current condition of riparian areas. Dr. Hansen focused on plant community health, but our observations also confirm that livestock related streambank structural issues exist as well. We believe the streambank structural deficiencies should be recognized as part of this Plan as well, in addition to vegetative

If grazing were to occur, how would riparian areas, including all seeps and springs be protected from livestock? We are disturbed by the Draft's common use of the term "*unauthorized livestock*" when discussing riparian areas, inferring authorized livestock may be permitted in riparian areas if they are under a permit. We can see no rationale for allowing any livestock grazing on any spring, seep or streamside riparian area in this WMA. WMA riparian areas continue to be damaged by trespass cattle. In 2016 and 2017 multiple members of our organization witnessed significant numbers of livestock concentrated in riparian areas of several drainages. These riparian areas are relatively rare or uncommon on the WMA and support a disproportionate number of species of wildlife, and of course, all aquatic obligate species. In addition past grazing and current trespass grazing has left them damaged and fewer palatable shrubs. Riparian areas, including seeps and springs, are attractions for livestock and are almost always overgrazed before uplands have significant livestock use. Have all seeps and springs within candidate grazing areas, in addition to streamside areas been inventoried and recognized as disproportionately important to this WMA? Draft management direction (p. 42) to "*plan to fence livestock out, using portable, temporary fencing whenever feasible and appropriate (emphasis added)*" is insufficient to protect this uncommon and disproportionately important habitat. Successful fencing of all riparian areas, seeps and springs should be mandatory criteria before that

"Healthy with problems" was a common diagnosis by P. Hansen for current condition of riparian areas. Dr. Hansen focused on plant community health, but our observations also confirm that livestock related streambank structural issues exist as well. We believe the streambank structural deficiencies should be recognized as part of this Plan as well, in addition to vegetative condition.

We support the proposal to designate campsites and prohibit camping elsewhere to minimize wildlife disturbance, reducing weed spread, and creation of off road disturbance.

While we appreciate the identification of interpretation needs and opportunities, we are concerned about cost, effectiveness, and vandalism. We support more interpretation that does not require expensive capital costs nor maintenance, such as up to date accessible, informative and up to date website sources and use of local docents as guides for interested groups.

We appreciate the recognition and general commitment to Species of Concern. Despite the commitment, the Draft Plan lacks a complete list of species of concern known to exist on the WMA. While the Draft has a few examples of Species of Concern, we request a list of known species of special concern be included in the Plan, and some assessment and direction on how this Plan will address each of their needs.

Since large conifers on the WMA are in short supply and important to a number of WMA cavity nesting species, we believe specific direction is needed beyond prohibiting firewood gathering for off WMA use. We urge that no firewood cutting be allowed for any standing trees and that only dead and down may be used for on-WMA-only use. The Draft Coniferous Forest section properly identifies protecting snags and snag recruits, but does not specify that wood cutting of snags or snag recruitment trees is prohibited if used within the WMA.

We appreciate the discussion and draft concerns related to invasive plant species (p32). Invasive plants are perhaps the largest threat to sustainability and capacity. With 22 species of noxious weeds occurring on the WMA already, this should be the paramount discussion of the Draft. What specific actions will be used to assure new species will be prevented from finding their way to the WMA? There appears to be a need in this Plan to initiate a cooperative, landscape scale program on surrounding lands to contain any new invasive species, as well as land use, travel or livestock practices that threaten to introduce new species. Controlling hay or recently fed livestock from other locations, dirty vehicles, disturbed soil areas, and other conditions and sources, and including prioritized spraying or other preventative or rapid controls need to be part of this plan. The Plan should include as assessment of the WMA vulnerability to spread of each listed invasive species and target control of those species with high potential for spread and negative effects when their existing distribution is currently limited and controllable.

We question both the need for and appropriateness in a "Habitat Plan" that specifically deviates from habitat to provide direction for winter elk hunting. This hunting direction is in conflict with confining this Draft to a self-described "Habitat Plan", especially after this Draft chose to omit a discussion of Elk Management Objectives. There is no supporting evidence offered that present elk numbers are damaging WMA habitats. The presence of elk using public winter ranges purchased in large part for their winter range values should be welcomed. A late hunt scenario would likely contribute to redistributing elk onto private lands, in conflict with direction elsewhere minimizing elk damage to private lands. How a late season elk hunt would occur without displacing elk off the WMA needs more explanation or specificity. A 2016-2017 FWP document describing shoulder seasons prefaced the table with a description of shoulder seasons as follow: "A shoulder season is a firearms season that occurs outside the 5-week general firearms season. The seasons focus on antlerless elk harvest on private land (emphasis added) and are not intended to replace or reduce harvest during the existing general archery and 5-week general firearms season." We are opposed to any shoulder season on Spotted Dog WMA. Other options exist to increase harvest, if necessary, during the regular seasons. There has not been documentation provided that current elk numbers are exceeding carrying capacity of the WMA.

We understand that this Plan could be approved without involvement by or approval of the Fish and Wildlife Commission. Without Commission approval, does this plan have the FWP commitment necessary for the public to be assured of long term management direction for Spotted Dog WMA?

We look forward to participating in future management of Spotted Dog WMA.

7 Thank you members of the Spotted Dog Working Group and DFWP employees for the work you have done in drafting this proposed plan. Spotted Dog deserves our attention and action; however, we must proceed with caution. The biggest threats to our success will be the actions taken for purposes other than protection and enhancements for wildlife and wildlands. McCarthy, Charlie

Threat 1 -- Proposed opening of the Old Stage Road by Powell County Commissioners. This road was closed by previous private landowners but was never formally abandoned by the county. It is my understanding it is still legally an "open" road. For more than 40 years the road was closed by private landowners without objection, now that these private lands have been transferred to public ownership, the county wants to reopen it for multiple purposes, some of which are in direct conflict with the purposes of this Wildlife Management Area. The same is true of an access road to the fishing reservoir. How would this road contribute to the preservation and conservation of the fish and their habitat? For certain, snowmobiles and ATV's should not be allowed on the WMA. If an individual cannot walk or cross country ski on the WMA in winter, why are members of the Working Group or County Commission considering allowing snowmobilers to "cross the WMA," especially through the heart of the winter range (Jake's and Freezeout).

Threat 2 -- Failure to integrate DNRC and FWP lands within the WMA. DNRC lands are governed by statutes and rules that are at cross-purposes with the purpose and need for this WMA.

Threat 3 -- Allowing for domestic grazing on the WMA. There is a lot of nostalgia for the return of Spotted Dog to its recent historic usage, particularly among members of the Working Group. The logging, mining and grazing activities of the past must be replaced by preservation of wildlife and their habitat if the WMA is to be successful. The Working Group membership should reflect the nature of the work to be accomplished by the WMA plan (specifically wildlife and wildlands specialists and volunteers) and not be dominated by groups or individuals who have motorized use, logging, mining, grazing or other purposes that conflict with the purposes of the WMA.

Threat 4 -- DFWP failure to be proactive with the recovery of the wildlife and lands resource. It is great to see the attention paid to the Paul Hansen Assessment. Actions must be guided by science. The infrastructure currently present on the ground that is not serving the purposes and needs of the WMA should be removed. Leaving old buildings, foundations, and equipment to the forces of nature is out-of-step with the current and future purposes of the WMA. We purchased the WMA with intentions of moving forward, not looking backwards.

This means, too, that FWP should remove the wildlife traps when they are not in use. If FWP does not have funding or manpower to remove infrastructure, FWP should recruit volunteers to do so. FWP should only provide additional infrastructure guided by its need by wildlife and habitat. In other words, be considerate of the resources when installing signs or developing publications. It is too soon to be thinking about trail development on the WMA.

The entire Appendix should be preserved elsewhere other than in the Wildlife Management Area Habitat Plan. As mentioned, this is a forward looking Plan, not a reflection of days gone by.

In closing, I am convinced we can and will do better for the wildlife and habitat on Spotted Dog WMA. The proof is already visible on the landscape. This Plan is a good start and will help guide future actions.

- 8 On behalf of Hellgate Hunters and Anglers (HHA) and our 300+ members we respectfully submit the following comments regarding the draft management plan for Spotted Dog Wildlife Management Area. Since the property was acquired, HHA has provided input and has remained very interested in the future management of this property. Many of our members hunt and recreate on this property regularly and we are deeply committed to developing a plan that prioritiz-
- Fischer, Kit
Hellgate
Hunters &
Anglers;
president
-

Public Access: The existing access on Spotted Dog WMA allows for both good wildlife security and dispersed recreation. While the access points and interior roads are few, the trade-off is good elk security and long walks to find elk. This is especially important in open country like Spotted Dog where elk and other big game species lack the escape cover and heavy timber present in most WMA's in western Montana. There has been ongoing discussion about opening access up again at the bottom of Jake Cr. as well as the old Mullan trail that bisects the property. HHA would oppose additional access into the WMA unless offset by additional closures. We know well that big game prefer to be as far from roads as possible, especially when canopy cover is sparse. As is the case for Spotted Dog- while a few road hunters may prosper with a short term gain, the long-term impacts of increased road density will have an adverse impact on elk staying on the WMA. We recommend the department increase signage of open/closed roads as well as parking and camping areas to minimize off-road activity. We also recommend that FWP work with MT DNRC to allow camping on state school trust lands on the WMA. In addition, if access is provided to neighboring landowners for cooperative use, they are bound by the same access limitations as the rest of the public – no special access should be granted to any member of the public through a locked gate.

Elk Management: HHA strongly believes that the elk objective in HD215 needs to be re-assessed since the purchase of Spotted Dog in 2010. Spotted Dog added an additional 40,000 acres of high-quality (primarily winter range) for elk. We recommend the Department calculate what the carrying capacity of the WMA is and add it to the current objective. While we understand the challenges associated with managing such a large number of elk, we also believe that the increased forage and winter range should provide the opportunity for a growing herd. With the existing liberal regular season opportunities and the shoulder seasons on private lands adjacent to the WMA, we believe the department has provided ample opportunity to manage the population. HHA would not support late season hunts on the WMA as a means to further

Other Species of Interest: We are heartened to see a mention of pronghorn and mule deer on the WMA. We would recommend the Department work to grow these populations and offer high quality hunting experiences as populations allow. In addition, we recommend the Department consult with their upland game bird biologists to enhance existing populations of Hungarian Partridge and consider the historical range of native grouse on the WMA (including sharptail). Many of these upland bird species (as well as big game) depend on aspen, chokecherry, elderberry, and kinnikinnick to flourish. Have these plant species been inventoried? Does the department see Spotted Dog as an important habitat linkage for NCDE and GYE popula-

Fisheries: Spotted Dog has several important streams that contain native cutthroat trout populations. We encourage FWP to minimize stream damage by restricting livestock access to these reaches and to prioritize riparian restoration to improve spawning habitat. Some of these streams contain brook trout – we would support the removal of brook trout to benefit native trout populations.

Riparian Areas: If grazing were to occur, how would riparian areas, including all seeps and springs be protected from livestock? We are troubled by the Draft's common use of the term "unauthorized livestock" when discussing riparian areas, inferring authorized livestock may be permitted in riparian areas if they are under a permit. We can see no rationale for allowing any livestock grazing on any spring, seep or streamside riparian area. These areas are relatively rare or uncommon on the WMA and support a disproportionate number of species of wildlife and of course, all aquatic obligate species. In addition, past grazing has left them damaged and with fewer palatable shrubs. Riparian areas, including seeps and springs, are attractions for livestock and are almost always overgrazed before uplands have significant livestock use. Have all seeps and springs, in addition to streamside areas been inventoried and recognized as disproportionately important to this WMA? While we appreciate FWP will "plan to fence livestock out, using portable, temporary fencing whenever feasible and appropriate" we would like to see stronger protections of these areas. Successful fencing of all riparian areas, seeps and springs should be mandatory criteria before that area can be grazed.

We noted, "Healthy with problems" was a common diagnosis by P. Hansen for current condition of riparian areas. Dr. Hansen focused on plant community health, but our observations also confirm that livestock related streambank structural issues exist as well. We believe the streambank structural deficiencies should be recognized as part of this Plan as well, in addition to vegetative condition.

We applaud FWP in their interest to restore beaver to the WMA and/or mimicking beaver dams. Largely absent from the entire WMA, beavers play an essential role in creating upstream water storage benefitting a myriad of species from big game to amphibians, birds and fish.

Grazing: Grazing on the WMA is one of the most contentious issues related to future management of the property. We believe livestock grazing and wildlife can be compatible on public lands, but we also believe that wildlife remain the primary focus of the WMA and that grazing should only occur when it will have no negative impact on wildlife. We recommend interior fences be removed as quickly as possible to aid in wildlife movement and that an exterior boundary fence be constructed to as soon as possible to help control trespass cattle grazing. We believe future cattle grazing should only be done when native plant, tree and shrub communities have recovered from decades of abuse. This ecosystem did not evolve with the high levels of grazing that were present in the short-grass prairie east of the divide, but we do appreciate that some grazing could be accepted on the WMA.

If grazing is permitted we would support prescriptive grazing permitted for a specific habitat treatment. Prescriptive grazing would likely change year to year in terms of the number of AUMs (duration, number of animals) as forage conditions allow. Term grazing, as granted in other WMA's through cooperative agreements, may benefit FWP through short-term wins with the neighbors, but may be a detriment to the long-term health of the range and may displace native wildlife. Prescriptive grazing could be achieved through temporary electric fencing for high intensity, short duration grazing treatments. HHA would not support the use of sportsmen dollars to manage a livestock grazing system on the WMA. In addition, we would not support domestic sheep grazing on the WMA as the likelihood for wildlife / livestock conflict is significantly increased. If livestock depredations occur on the WMA, we recommend that carcasses be removed in a timely manner and that predators (bears, wolves, lions) are not killed as a consequence of conflict on public land.

Invasive Plants: As Hansen stated in his report, non-native grass species in particular are the biggest threat to wildlife habitat on the WMA, namely cheatgrass infestation. We recommend the department coordinate with the local weed district, NRCS and other relevant state and local agencies to develop an action plan to address cheatgrass infestation and treatment options on the WMA as well as treatment options for other invasive plant species. How would increased access, livestock grazing, and fire effect the spread of invasives?

Fire: How would FWP utilize fire, both prescribed and natural, as a habitat management tool on the WMA? How would fire impact the spread of invasive species or impact elk winter range? Would FWP allow some fires to burn if they posed no significant threat to private property?

Economic Impact: The economic impact of having such a phenomenal piece of wildlife habitat should not be understated or overlooked. Has FWP looked into what the economic impact Spotted Dog WMA has on the neighboring communities of Deer Lodge, Avon and Elliston? Hunters in particular are a significant economic driver for many small town communities and having such a re-

Thank you for the opportunity to comment and weigh in on this draft plan. We look forward to work-

- 9 After studying the Spotted Dog Wildlife Management draft habitat plan, Rocky Mountain Stockgrowers (RMSGGA) would like to go on record that we feel the Draft Management plan for Spotted Dog WMA (SDWMA) is far from being complete.
- First of all, the current goals in the management plan are very vague with no measurable objectives or benchmarks. For example, how does FWP benchmark sustainability for future generations or identify how FWP is being a good neighbor? Without measurable objectives, it is impossible to determine if the management plan is successful or even progressing as desired.
- The second area of concern is the lack of addressing grazing as a tool within the SDWMA. There have been several years of successful grazing management protocols put together on other WMA's around the state and to leave grazing out of the SDWMA draft management plan is not acceptable.
- For example, the Fleecer coordinated grazing program was implemented in 1988 and follows rest-rotation grazing principles. While we understand that it takes time to plan a rest-rotation grazing system, not having some sort of backbone within the SDWMA management plan is leaving it incomplete.
- From the document that Michael Frisina and Forest Morin wrote "Grazing Private and Public Land to Improve the Fleecer Elk Winter Range," they state that the Fleecer coordinated grazing program is a practical solution to enhance forage quality and quantity by applying early spring cattle grazing, rest-rotation, grazing principles and integrated management of various land ownerships. Coordinated management resulted in substantially increased cattle and elk numbers, while resolving a land owner tolerance problem.
- According to research by Michael Thompson and Karl Grover, both FWP personnel, "Factors Influencing Spring Feeding Site Selection by Elk in the Elkhorn Mountains, Montana," elk appeared to react favorable to previous cattle use in their selection of spring feeding sites. This was due to the removal of residual vegetation by cattle. Cattle grazing could also be easily manipulated to improve spring elk forage and may be a tool for land managers.
- The Beartooth management plan (BTWMA) specifically identifies the objectives of their grazing rotation system: 1. by promoting maximum plant production, vigor and nutrient content. 2. Increase the attractiveness of late fall and spring forage to elk, thereby influencing distribution and minimizing depredation to other private lands. 3. Implement a long term, beneficial grazing system and by bringing adjacent landowners into similar management, simultaneously meeting landowner needs and tolerance.
- Furthermore the BTWMA identifies that dates of grazing are dictated by plant phenology to include spring green-up, plant availability and seed ripening, forage consumption in active pastures and hunting and recreational demands upon the area. Flexibility is critical in effective operation of a grazing system of this magnitude and of such public interest.

Conn, Dan;
Matt Gravelley; Joe Dippold; Brian Quigley; Rocky Mountain Stock Growers Association; president, vice president, director, member

The Beartooth management plan states that grazing on the BTWMA portion of the system has resulted in dramatic improvement in vegetation composition, compared to adjacent un-grazed portions of the WMA.

RMSGGA believes that a blueprint for the SDWMA is already in place by using the models of Fleecer and Beartooth WMAs and have been approved by FWP as working plans already.

RMSGGA realizes that there are several factors in developing a grazing plan that fits the needs of the SDWMA, from developing pastures, a grazing rotation scheme, to stocking rates, but we also need to start with the basics and implement the backbone of that plan into the current management plan. Background work has already been done by the citizen's advisory group on looking at soil survey maps to start determining stock rates and the amount of available forage that the property can produce. (Please see the attachment). FWP personnel have also met with several surrounding land-owners and that feedback needs to be included.

Much of the public forgets that not only does domestic livestock consume pounds of forage but wildlife also consumes several pounds of forage a day both on public and private ground. If managed properly the two can work symbiotically and are a benefit not only to the resources but to the habitat as well.

The questions that RMSGGA proposes to this management plan and should be discussed further before adopting this plan are:

Can we increase the number of one RENEWABLE resource (grass and range) of the WMA by using cattle as a tool to enhance wildlife habitat?

Can we increase the economic stability of our county and provide a resource for our agriculture businesses and surrounding neighbors of the WMA?

The key component to remember; Elk have wintered on this range for several years, wildlife has used this property for 100's of years but also domestic livestock have been a part of that habitat. The appeal of this property to FWP was for winter elk habitat as the primary goal and FWP has to take into consideration how this property had been managed previously and it was managed with domestic livestock. Since the purchase, FWP has managed it without domestic livestock and this has changed the habitat of wildlife that exist within the WMA.

Having a viable grazing plan has proved to be very successful for other WMA's and as an organization RMSGGA feels it must be a part of this current management plan that is being drafted.

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- 10 The Gallatin Wildlife Association (GWA) is a non-profit volunteer wildlife conservation organization representing hunters, anglers and other wildlife advocates in Southwest Montana and elsewhere. Our mission is to protect habitat and conserve fish and wildlife. GWA supports sustainable management of fish and wildlife populations through fair chase public hunting and fishing opportunities that will ensure these traditions are passed on for future generations to enjoy. We support the Montana constitution which states: "the opportunity to harvest wild game is a heritage that shall forever be preserved" and that "the legislature shall provide adequate remedies to prevent unreasonable depletion of natural resources."
- GWA questions the adequacy of the stated primary purpose of the habitat plan: to "benefit wildlife and fish habitats" (p. 8). We agree that the primary purpose should relate to wildlife conditions, as opposed to secondary goals. However, we note that the ultimate purpose of benefitting habitat on a WMA is to maintain and manage wildlife populations. Thus, we suggest adding "and populations" to this goal statement. We also note that it will be necessary to measure trends for selected key species of wildlife and fish populations on the WMA, in order to evaluate effectiveness of FWP activities. (The common FWP practice of evaluating WMA management practices almost solely with vegetation studies is not sufficient to determine if public resources are being used efficiently and effectively to achieve stated wildlife and fishery goals. Population responses must be measured. See below.)
- We support the strategic purchase or exchange of lands with NRDC, the Forest Service, or private owners in order to consolidate FWP holdings at Spotted Dog. This should reduce administrative costs and reduce or eliminate constraints on selecting management practices and achieving FWP's primary objectives for the WMA.
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Hockett,
Glenn; Gal-
latin Wildlife
Association;
president

While there appears to be no absolute commitment in the Plan for developing a livestock grazing program on Spotted Dog, the possibility of a grazing program is mentioned often and GWA expects FWP to promote a program similar to those on so many other WMAs. In this regard, we note information (pp. 3-4) indicating that enhancement of the elk population should not be used as a justification for a livestock grazing program on Spotted Dog. (1) Elk numbers in HD215 doubled during 2008 – 2017, with “limited grazing” on the WMA during 2010 – 2013, and no grazing of livestock during 2014 – 2017, indicating that livestock grazing is not necessary to enhance elk numbers. (2) Elk numbers in HD215 are about 100% over the objective in the Elk Management Plan, so committing FWP resources, presumably to enhance the population, would be inconsistent with achieving this objec-

GWA recommends establishing two representative control areas of 1 square mile each on Spotted Dog. These would be useful in the future for comparing and monitoring effects of management activities on the remainder of the WMA. Control areas should contain both riparian and upland habitats. They would receive no habitat manipulation (other than possible local weed control) and be off limits

We strongly agree with the Plan’s emphasis on the values of wetlands, seeps, springs and riparian areas, and its commitment to protecting these areas. This commitment should preclude water diversion, which does not seem to be mentioned.

We encourage widespread reestablishment of beaver with dedication of sufficient riparian habitat to allow for long-term rotating occupation of dam sites. We believe that abundant and well-distributed beaver ponds are a critical habitat need of moose. They provide abundant moose forage and also escape habitat for moose calves in the presence of wolves. In this regard, please consider an exten-

GWA believes the wildlife values of grazing programs on many other WMAs have not been justified or demonstrated – either with objective reviews of the scientific literature or with on-the-ground testing on the WMAs. (We have submitted abundant references to the science literature questioning the wildlife values of livestock grazing. These are available on request.) Moreover, negative effects of livestock grazing on WMAs have included abundant fencing, diversion of natural waters, degradation of riparian areas, weed dispersal, degradation of nesting habitat, and competition for forage. For these and other reasons, including paragraph three above, GWA requests that Spotted Dog not be grazed by livestock. It should provide a real wildlife area that would add to landscape diversity

However, if Spotted Dog is to have livestock grazing anyway, Spotted Dog offers a new opportunity to test FWP assumptions of the wildlife values of grazing. We would suggest a designed comparison of wildlife responses to grazing frequency by comparing trends of wildlife use on ungrazed control areas vs. infrequent grazing (once each 4 years) vs. the 3-pasture rotation system commonly used by FWP with grazing twice each 3 years. In any event, any grazing system on Spotted Dog should be applied with ungrazed control areas to provide reliable information on grazing impacts to key wildlife species and to test whether livestock grazing provides better results than less expensive non-grazing.

GWA suggests minimizing fencing and any new roads, consistent with providing appropriate but limited vehicle access. Any predator control on the WMA should only be in response to a documented need for human safety or to prevent property damage on neighboring lands, where the problem may not be solved by actions off the WMA.

We find only a weak and vague commitment to “maintain and restore” species of concern “when appropriate”. (Nine birds, 3 bats and 1 amphibian are variously listed as “examples” of species of concern on Spotted Dog, pp. 36-38.) We request that a more complete list of species of concern that are expected on Spotted Dog be developed promptly, for the record. Under what conditions will it be “not appropriate” to maintain and restore species of concern? It is noted that inventory and monitoring of all species of concern can detect population declines (p. 38). But there is no commitment to this activity for any species. (Exploratory inventories of non-game may occur occasionally – p.30). This issue needs more attention than provided in the Plan.

We find the commitment to monitoring (pp. 4; 29-30) to be inadequate. The emphasis is upon measuring condition and trend of vegetation every 5-10 years. Methods and standards for these surveys have been developed primarily for evaluating livestock ranges for livestock production. They are not adequate for dealing with the full range of wildlife relations to habitat structure or to disturbance-succession gradients. Largely, they ignore the concept of limiting factors. (Resources may be spent producing habitat that is not limiting to a particular population.)

The Hansen vegetation surveys will not provide information on wildlife responses to management activities. Wildlife population surveys designed specifically to evaluate management effectiveness are needed. "Fish and wildlife surveys, scheduled as needed in accordance with regional information priorities" (p. 30 and elsewhere) will be inadequate for this purpose. There must be a commitment to evaluating responses of key wildlife species to management, with sufficient sampling and control areas for comparison. This is active-adaptive resource management that can lead to more effective and efficient use of public resources.

Thank you for this opportunity to comment on the Spotted Dog WMA Habitat Plan, 2017.

- 11 The Montana Wildlife Federation is our state's oldest wildlife conservation organization. We were formed in 1936 when hunters joined landowners to restore depleted wildlife in our state. For 81 years we have worked to ensure abundant wildlife, healthy habitat and public opportunity to enjoy our public resources. Our members have a strong interest in the future of the Spotted Dog Wildlife Management Area. Many hunt on the area and several have been engaged in discussions as we look to what conservation
- Gevock,
Nick; Mon-
tana Wildlife
Federation;
director

We support the key points that three of our affiliates – from Helena, Anaconda and Missoula – that have submitted formal comments on the management plan. With that in mind, MWF encourages Montana Fish, Wildlife and Parks to consider these key elements to future management of Spotted Dog WMA.

1. Consider more than just elk in the management of Spotted Dog WMA. The report is heavily slanted toward elk. Clearly this area was purchased with elk as a major emphasis, and it supports a large herd that offers excellent public hunting opportunity. However, there are also pronghorn antelope, mule deer, white-tailed deer, black bears and wolves there. These game species need consideration in the management of the WMA. Spotted Dog is also part of a key corridor for grizzly bears between the Yellowstone and Northern Continental Divide ecosystems. The management of this area also needs to consider the numerous non-game species, including songbirds and small mammals. Take a more holistic, ecosystem approach to this area's management and work for balance for all native species.

2. Any livestock grazing must be done so that the primary purpose is to benefit wildlife. The area is clearly degraded by years of overgrazing, and it needs significant rest before any livestock are grazed there. It needs work done on internal fencing to make wildlife movement easier, and riparian areas need to be kept free of livestock for considerable time to recover. The area needs a livestock grazing management plan before it can be grazed. And any grazing must have a net benefit for wildlife, including elk, by garnering more tolerance for elk on adjacent private lands at certain times of the year. There are other examples in Montana where grazing on a WMA has been done in conjunction with a landowner who provided winter forage for elk when it's needed. Look at these models to develop a plan and work with local stakeholders in its development.

3. There should not be hunting on the WMA outside of the archery and general rifle seasons. Special shoulder seasons should not be extended onto the WMA, since these lands are meant to provide winter range for elk and other wildlife when it's most needed. In addition, with the purchase of the WMA, there is far more land in the hunting district that is public, with a primary purpose of providing wildlife habitat. The elk objective for the district needs to be raised to account for that.

4. More attention needs to be paid to the fisheries value of the streams on Spotted Dog WMA. The area has streams that support native cutthroat trout, and these should be enhanced to promote their population.

5. Travel planning and public access should be aimed at ensuring good access to get to the WMA, but also maintaining security habitat for elk and other game species. We do not need additional motorized use in the WMA, because the current amount of open roads helps maintain good elk security and that in turn creates hunting opportunity.

Thank you for the opportunity to comment on the management plan for this quality WMA. We are committed through our members and affiliate clubs to be good partners in helping improve the management at Spotted Dog to benefit wildlife, and Montana's hunters and anglers.

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| 12 | The following comments are made on behalf of the Clark Fork Coalition (CFC) and relate to the Draft Management Plan for the Spotted Dog WMA prepared by Montana FWP with the support of the Spotted Dog Working Group. | Gorder, Andrew; Clark Fork Coalition; legal |
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The Coalition is actively involved in the ongoing restoration work within the Upper Clark Fork and has a vested interest in protecting clean, cold and abundant water within the basin. In addition, the Coalition has a vested interest in water quality as the owner of senior water rights in the Upper Clark Fork dedicated to instream flow purposes for the protection of the fishery resource.

In general, CFC supports the plan's steps to protect and enhance the natural resources of the Spotted Dog WMA. We offer the following comments specific to the fishery resource, including water resources, stream habitat conditions and riparian health.

CFC encourages FWP to identify the waterways that are most at risk and prioritize this work based on this need. According to Hansen et al. 2015, the largest needs appear to be in MU-5 on Trout Creek, which was categorized as "unhealthy" on the whole. Other waterways assessed in MU-1 (O'Neill Creek), -2 (Freezout, Jake and Fred Burr Creeks) and -3 (Spotted Dog Creek) were categorized as

CFC concurs with FWP that one of the primary detractors from the health of the fishery resource and riparian areas within the WMA is from trespass cattle. However, while the plan recognizes that riparian fencing is needed to keep livestock out, there are few details about where or when the fencing will be installed.

Regarding sediment delivery to streams, CFC supports the Priorities for Special Projects to aid wetland and riparian health, which includes redistribution of beaver as the forage base would provide. FWP has historically recognized the benefits of beaver and beaver ponds, which help improve water quality by removing or transforming excess nutrients, trapping silt, binding and removing toxic chemicals and filtering out sediment

Finally, the plan recognizes that road culvert adjustments/replacements are needed on a minimum of 25 culverts to reduce negative sediment impacts to streams on the WMA. The plan further states that active stream restoration is needed in at least some areas to address habitat degradation and channelization. However, little detail is provided to explain what concrete actions will be taken or when these will occur.

Again, we support and appreciate FWP's and the Working Group's efforts to protect Spotted Dog's Resources. Thank you for the opportunity to comment.

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| 13 | I support protecting as much of Spotted Dog WMA from livestock grazing as possible. Its my understanding that since grazing has been reduced on the WMA, elk have been more frequent. This presents great hunting opportunities for sportsmen. Thank you. | Russell, Alex |
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14 I would like to say that I appreciate the work that was put into the "Draft" Spotted Dog Wildlife Management Plan 2017. The broad approach and the attention to the science of habitat management were impressive. There is an underlying sense of the sincerity of mission that is obvious to the reader and participants in this process.

O'Rourke,
Craig & Barbara

During the meeting of 11-30-17 some errors were pointed out. I am sure these will be corrected prior to the final plan coming out. Some of these were of little consequence, but important none the less.

I would like to focus my comments in a few very specific areas. Some overlap, but I will try to be very specific in organizing my thoughts as they apply to the Goals and Objectives of the Spotted Dog WMA.

OBJECTIVES/GOALS: #1. "The primary purpose of the Spotted Dog WMA is to benefit wildlife and fish habitats and natural resources on behalf of the general public."

#2. "Actions will be sustainable for future generations."

#3. "Provide access for a wide variety of uses consistent with the management plan."

#4. "Be a good neighbor with the landowners and residents of Powell County."

WEEDS or INVASIVE SPECIES: Obviously, weeds are not good habitat for the wildlife, in most case. I would like to see more weed control, spraying of spotted knap weed, along the closed roads. I walk extensively on these roads and observe severe infestations that are easily accessible. I would also like to see more attention to weeds along the boundary lines, especially on the east side of the WMA. It is very obvious that neighboring landowners are doing a much better job of controlling weeds than the WMA. This does not speak well when considering OBJ. #4.

GRAZING: It was stated at the meeting on 11-30-17 that grazing was not being considered in this plan and that it would require a MEPA document should it ever be considered. I do not believe this is the case. Grazing was a big part of the management of the WMA until a couple of years ago. It is nothing new to this property.

It is my opinion that grazing could be a useful tool to help meet the objectives of the WMA. FWP touts great success in other areas with elk and cattle actually complimenting each other by utilizing the available forage more efficiently. In some areas of the WMA grazing of cattle or sheep could be used as a tool to control some weeds and better utilize the available forage. It seems like the FWP is

Grazing would also provide funds to help with many expensive needs of the WMA, such as weed control, road maintenance, fence construction and maintenance, as well as enforcement of the rules.

Grazing could support all the objectives, if done on a limited basis and managed properly by the WMA and the people having livestock on the property.

ACCESS: I feel strongly that the current access to the WMA is more than adequate to meet the objectives. I am adamantly opposed to opening of the Old Stage Road (OSR) as is proposed by the Powell County Commission. The FWP should apply all pressures available to them to insure that this road remain closed. FWP has an enormous ability to lobby at all levels of government. This

The OSR in question, beginning on Freezeout side, crosses approximately 2.5 miles before it touches the WMA at the wire corrals. For this approximate distance it crosses private land. After a very short distance on WMA, it then enters private land again for most of 2 miles. The wire corral access point is only a short walk from the parking lot at the end of the O'Neil Creek Ridge Road. I have walked this route several times and cannot understand what advantage having driving access to the

The OSR, if opened would only serve as another problem of weed control and erosion. We all know that Powell County can't keep up with existing roads. Why would we assume they could control weed infestations and erosion caused by vehicular traffic across the WMA.

The OSR crossed the heart of the WMA. Opening this route would be detrimental to the migration habits of the elk that use the winter range. The elk need the winter months to rest and prepare for calving. Snowmobile traffic would interrupt this pattern.

The landowners that are directly affected by the opening of the OSR have been more than generous to hunters that are willing to be respectful and respect the land. I personally have been treated fairly by them when asking permission to hunt. These landowners support efforts by the FWP to control elk numbers. They also cooperate with the shoulder hunts on the private land. I only wonder how long this cooperation will last when the public is allowed to drive across their land on the OSR without limitations.

Opening the OSR goes against all 4 of the objectives of the WMA. This should be priority #1 on the list of things to stop by the FWP.

ENFORCEMENT OF RULES: I first began recreating on the WMA in the early spring of 2011, shortly after the gates were opened. I have continued to hike, hunt and enjoy the property since that time. In almost 7 years I have never seen any FWP or other enforcement folks. Yet every spring there are ATV tracks all over the property that were made during the closure period. This needs to

During the 2017 hunting season I saw evidence of an elk being dragged out of O'Neil Creek with an ATV. Again I have never seen a FWP warden or employee on the WMA. I understand the cost of this enforcement, but to meet the objectives, enforcement is paramount.

Why would I expect to see enforcement of staying on the road should the OSR be opened? The sheriff of Powell County surely won't patrol it, especially during the winter months when snowmobiles are using the route.

CONSOLIDATION OF DNRC AND FWP LANDS WITHIN THE WMA: I am absolutely opposed to the consolidation of DNRC and FWP lands within the WMA. The DNRC are multiple use lands that are supposed to be managed for the benefit of the School Trust. This would be lost if totally owned by the FWP. The school trust lands should be sacred and untouchable forever.

HUNTING DURING CLOSED PERIOD: I am opposed to any hunting on the WMA during the winter closure. Winter hunting would be directly in conflict with the objective that gives wildlife a safe place to winter and prepare for spring calving. The WMA is deemed to be winter range for elk and mule deer. Hunting would disrupt this immensely.

The shoulder hunts on private land seem to be working well. They not only help reduce numbers, but also help keep the elk and deer off the private lands and out of some hay stacks. This supports the objective of working with the neighbors and the public. Again I will state that the neighboring landowners have been very generous about letting people hunt on their property.

Thank you for your efforts and hard work. I appreciate the opportunity to be a small part of the future of this magnificent property.

- 15 1. Most importantly, we support managing the publicly acquired spotted dog WMA as intended by the grant monies awarded to MT FWP, for the purpose of protecting fish and all wildlife populations, and the land itself. I applaud FWP and working group efforts to comprehensively consider and prioritize the diverse wildlife species and habitat types on the WMA. McEvoy, Stephen; Helena Hunters and Anglers;

2. *[FWP note--paragraph/bullet #2 was a very long paragraph; we have divided it into 6 sub-paragraphs so it can be adequately displayed in this Excel format.] The first few paragraphs of the plan emphasize the plan does not specifically address elk populations or objectives. Discussing exact objectives in this report may be outside the Habitat Plan scope, but it's deficient to avoid any reference to big game carrying capacity or habitat requirements. It's also inconsistent to produce a "habitat plan" replete with references to livestock grazing, and at the same time absolutely avoid forage availability conflicts and interactions between cattle and elk on the WMA, as well as impacts to big game and wildlife in general by grazing on the public WMA.*

Although a key issue in determining wildlife habitat quality on the WMA, the Habitat Plan is severely lacking by excluding any analysis of big game habitat potential. Although discussion relating to big game numbers was discouraged for the public, and deemed irrelevant within the plan itself and during the habitat plan review meeting, the Region 2 FWP supervisor privileged himself the opportunity to voice his *judgment regarding elk populations during the hp review, saying “we have too many elk already”*. *Despite this statement, and numerous references to grazing the WMA, and in an effort to diminish the relationship between forage unavailability on public lands and “elk damage” to landowners, the habitat plan states “these facts do not preclude livestock grazing as a tool for enhancing wildlife habitat on portions of the WMA....”*

The “bitterbrush” section further recommends elk numbers be “balanced” (ie. kill more elk, but no mention that early season cattle grazing is especially detrimental to bitterbrush, when carbohydrate reserves are being replenished.), although the subject of cattle grazing impacts to big game forage is avoided. Habitat is the basis for determining wildlife numbers, and one of the main components of habitat is food (forage). Why would a “habitat plan” avoid any reference to big game carrying capacity, when habitat quality and availability is impacted by population? Because population objectives are addressed by the elk management plan doesn’t mean population relationships to habitat can’t be discussed, and those considerations incorporated into the plan. The WMA was in part acquired for its outstanding and critical big game winter range. Avoiding scientific assessment or reference to carrying capacity neglects an additional and important metric to assess habitat quality and potential, a metric useful at FWP Commission meetings if amending elk population objectives are to be scientifically discussed. But the “habitat plan” says nothing about forage capacity for big game, and because the working group and habitat plan have not addressed it, information won’t be available for evaluating population objectives, or for generally informing the FWP Commission. This omission makes data based review of population objectives less likely, and stacks the deck in favor of lower population objectives. The report spends a large amount of verbiage on “health”, but the state of habitat condition depends directly on habitat use and impact by varying population.

Elk population objectives haven’t been reviewed since 2008, so don’t account for 59 sections now being managed specifically for habitat. When managed for wildlife the WMA should allow for a higher population objective than in 2008. Fifty nine square miles offers huge amounts of forage, and big game will spend an increasing amount of time on the WMA by virtue of its size. In response to impacts by elk to private lands, and as measure of forage availability, it’s important to consider impacts of past and current cattle grazing *on public land to public elk herds. As a measure of forage availability, lease capacities on DNRC and adjacent USFS lands account for over 4100 AUM, or 350 cow/calf pairs on a twelve month basis, or 1300 mature elk year around. Again, this forage volume accounts for public ground only, and doesn’t account for 43 square miles (27,600 acres) already owned by FWP. With improving range conditions on the WMA, it’s reasonable to expect healthier grasslands and better forage availability. Obviously the forage base is adequate to sustain more than the current elk population “objective”, and is reason to consider management alternatives given increased habitat area.*

Elk populations compete with private interest grazing entities, but this land was acquired with funds prioritizing wildlife resources as first priority to benefit the *general public. The right to participate in WMA management shouldn’t be confused with an expectation to personal financial interest through grazing by any party. The intent of the purchase was to prioritize fish, wildlife, and habitat. Nonetheless, past SDWG meeting minutes indicate surrounding landowner interest in grazing cattle on the WMA. A FWP biologist mentioned (5_18_17 SDWG minutes) that “we have been having landowner meetings and there is a lot of interest in having the spotted dog being a part of their landscape” (ie grazing program).*

Forage competition between cattle and elk is a vital issue, and forage is connected to habitat in a fundamental way. Draft authors refuse to discuss elk numbers, but at the same time entertain cattle grazing, completely without discussing impacts to elk habitat and habitat in general. For all the euphemistic talk about cattle grazing “enhancing habitat”, the report contains no data referencing habitat enhancement by cattle grazing. Please cite conclusive applicable data on how cattle grazing will enhance habitat with respect to habitat objectives and governing conditions found on the WMA. The WMA is large, and has the capacity to attract large elk numbers for extended periods of time. Diminishing WMA forage risks aggravating private land conflicts.

3. The habitat plan specifically mentions these objectives among *many others*:

--Protecting aspen and riparian areas

--Preventing conifer encroachment in aspen stands

--Preventing stream side erosion, sediment, incised channels, and noxious weeds

--Providing for more vegetative litter and decay

Cattle grazing has been shown to be frequently and in practice incongruent with these objectives.

4. Regarding the “guiding principles” statements prefacing the habitat plan, Statement 4 urges that (FWP) “be a good neighbor with the landowners and the residents of Powell County”. Just as importantly, landowners are to be good neighbors to FWP and all Montanans, regardless of proximity. Taxpayers bought it, and don’t have to live in Powell county have a seat at the table. Nor do they have to live next door to value the WMA. The 2013 grazing extension came about in response to uncontrolled stock. Even after the grazing extension ended in 2013, the acquisition has still been grazed by “neighboring” but trespass cattle. The public is contributing \$146k to fencing costs to prevent unwanted cattle from negatively impacting habitat and sensitive riparian areas. Despite what range laws may say, “good neighbors” control their stock, and respect neighboring land owners, even when land is in public ownership. The public is paying a neighborly sum \$400k for weed suppression to improve native plant communities. Neighboring land owners oppose higher elk populations yielding increased public hunting opportunity, but often generate private income by denying the public permission to hunt during the general season, and/or frequently deny public hunters the chance to take a bull as allowed under general regulation. In past working group meetings FWP has suggested the public, after buying the ground, will pay for fencing materials. While I support working for solutions that address losses to landowners, I urge FWP and working group members to accommodate and prioritize public interest on the WMA, and make sure “being a good neighbor” is a two way street.

5. Manage conifers? These lands were *extensively logged by RY Timber Company soon before being purchased by FWP. Google earth images plainly show the land has been thoroughly logged. Roughly 25% of the WMA is classified as “coniferous forest” by Hansen (Ecological Inventory 2015). More accurately, this “coniferous forest” has lost much of its integrity as a forest. These woodlands and conifers don’t need to be “managed”, they need to recover. Given the intense logging over the larger landscape, and a large amount of recovering indigenous grassland area, “conifer encroachment” isn’t detrimental at this time. Prior to extensive logging, conifer encroachment was likely encouraged by intense grazing, and may have been a problem. Wildlife of all types utilize and need low elevation timber stands and thickets, especially during cold and windy conditions. Thermal cover and more dense stands relatively close to feed are especially important to winter habitat, and will help keep wintering big game on the WMA. Thin and residual timber within large logged areas does not provide quality thermal and security cover. The plan mentions developing a “forest management plan” to bring about a “healthy forest structure”. Please define a “healthy forest structure” and explain why it is “healthy”. These terms sound well intended, but are general with widely varying interpretation. Without definition, they can be used to justify ecologically detrimental treatments/ management plans.*

6. On page 35, the "Management Direction" section calls for cattle grazing to be considered to "stimulate and maintain native forb component in grasslands". Within range literature, "excellent" range condition is referred to as the "climax" vegetation community, because by definition it's the plant community having developed and matured under natural conditions. Past economic grazing has left the land in the shape it is today. Plant communities are beginning to recover from cattle grazing. For millennia these grasslands have done just fine providing for a ratio of increasers to de-creasers. These grasslands don't need cattle grazing to be "healthy". Sure grasslands have always been grazed to some extent, and wildlife can provide it. Please provide data showing how cattle grazing will "maintain the native forb component", and why the native forb component is unable to exist without cattle grazing.

[7.] Also with cattle grazing comes the need for fencing dividing the land into separate areas. Given the size of the WMA, this could easily entail many miles of fencing. And riparian and sensitive areas would require fencing. Not good for people or wildlife.

8. On pg 39 under the sub section "prioritizing elk winter habitat", the following statement is made: "Control hunting access if required during winter months to achieve elk harvest goals, while minimizing disturbance to elk on their winter range". The suggestion that elk be hunted while wintering on a 59 square mile piece of ground able to support their wintering habitat needs, and bought for such purposes, is illogical. Winter hunting to "move elk around" during winter months 1) opposes efforts to keep elk on the WMA, 2) is biologically unsound, 3) ultimately diminishes hunting opportunity, and is un-sportsman like when elk weakened and stressed during late winter months . Of special note is the fact that some neighboring landowners don't allow hunting. Landowners asserting their right not to allow hunting shouldn't expect public wintering grounds to be kill zones for shoulder seasons.

16	<p>This is in regard to Bonneville Power Administration's (BPA) receipt of your notice of the draft management plan (DMP) for the Spotted Dog Wildlife Management Area (WMA). A brief review of the DMP shows that two Management Units, O'Neill Creek and Freezeout-Jake Creeks, have boundaries that surround our BPA 500 kV powerline, Broadview-Garrison No. 1 and No. 2. We are aware that this DMP encompasses plans to identify priorities and strategies for conserving fish and wildlife habitat in these areas. BPA's priorities throughout this plan's implementation will be to work with your agency and ensure that access to these lines remains unobstructed.</p> <p>Please keep me updated as the plan's framework continues to progress. If you have any questions or to discuss this issue further, please contact me via regular mail at Bonneville Power Administration, Realty Specialist, TERR/Kalispell, 2520 Highway 2 East, Kalispell, MT 59901, via email dtsmith@bpa.gov, or telephone at 406-751-7824.</p>	<p>Smith, Dustin; Bonneville Power Ad- ministration; realty spe- cialist</p>
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FWP and the Spotted Dog Work Group held a public meeting on November 30, 2017 to solicit public input on the draft Habitat Plan. Following are meeting notes taken by Jodi Pauley for the Work Group.

SDWMA Public Meeting November 30, 2017

Public Meeting for the draft management plan was called to order by John Hollenback at 6:40 pm on November 30, 2017 at the Elks in Deer Lodge. Members present were: Neil Horne, Louis Smith, Dan McQueary, Pat Hansen, Jodi Pauley, John Hollenback, Jason Swant, Bill Pierce, Bill Mosier, Gayle Tomlinson, Brian Quigley. FWP present: Rick Northrup, Randy Arnold, Jason Lindstrom, Brady Shortman, Julie Golla, Kelvin Johnson, and Mike Thompson.

Mike introduced himself at the public meeting. He said we called this meeting to go through the management plan and come to a mutual understanding on what should be included or taken out of the plan. He gave a background of the Spotted Dog and how FWP came about to purchasing the property. He said FWP also felt it was important to have a citizen's work group and that was formed in 2013. He said this meeting is designed to take in public comment, take detailed notes and then the committee will deliberate as a work group and decide how to implement those comments. This is a working document and will change in the future as we move forward.

Mike said the work group was formed in 2013 and the group decided to have John Hollenback be the chairman of the group. John gave a history of how the working group was formed. He said this group has taken tours of the Spotted Dog to get to know the landscape better and learn more about the habitat of Spotted Dog. He said we also worked on doing some education of how other WMA's work, the members, and other assessments were done by FWP. We also broke our group into special committees dealing with public access, wildlife, natural resources, history, etc. and this was the backbone to developing the management plan. John said he thinks this committee should continue meeting in the future to make sure that the property continues to go in the right direction. He said we have to remember this property was bought for wildlife enhancement.

Mike said we will take comments through December 8th on this management plan. Mike said the meat of the plan is in the executive summary. He also highlighted what is in the management plan. He said the Spotted Dog is not a stand-alone property but part of a larger ecological system and the areas surrounding the property. He said part of the charge is winter habitat for elk and this is a major part of our management plan.

Mike moved into discussing the Executive summary and one of the major discussion areas is our current elk numbers and that there are too many and instead of trying to manage habitat for increased elk we need to manage our elk numbers and that is being taken care of in a different area of FWP on a statewide basis. He said at the same time we need to still be managing habitat for the Spotted Dog and surrounding areas.

Mike said the Spotted Dog wildlife management area is for public input and for public access. He said the working group was the public's voice to get to the draft of the management plan. He said this is not a MEPA document. He said where MEPA would be introduced, for example, is if cattle grazing became a tool then that would go before the public and the commission and through the MEPA process. This document gives us the sideboards to get started to implement any of those types of proposals that are brought forward.

There was a question about access during the winter months in that snowmobiles need to stay in designated areas but what about walking or cross-country skiing, etc. Mike said people can walk in there or cross-country ski and he said that could be clarified better in the public access area.

There was a question about camping and how that is going to be handled between DNRC and FWP managed lands.

There was a question about opening the old stage road and how would FWP handle snowmobile access as that could create a conflict of interest. Bill Pierce commented that the old stage road has always been a public access road and has been a public

road all along. He said about 40 years ago that road was basically locked off and simply has not been used. He said the current commission is wanting to open the road and if that happens it would be open to wheeled vehicles and could be open to snowmobiles. He said that road is out of the jurisdiction of FWP and is in control of the county. Randy said right now it is still moving through the district court system. The comment was why is this an issue all of a sudden when it is public ground because before when it was private land it was never an issue. Bill said it is out of our control on what the county does.

Joe Dippold asked on Page 15 how are the Management Unit boundaries identified. Mike said it was identified by the water shed boundaries basically.

Joe Dippold asked on Page 30, about the basics of inventory and is that only going to happen every 10 years or would there be other changes in between. John commented that he thought it would be ongoing, the every 10 years would be an in-depth assessment only but there would be other assessments in between so it doesn't get out of hand. There was agreement that if situations arose that changes should be addressed.

Joe Dippold asked what kind of partnerships is FWP looking at with private landowners to work on management schemes from grazing to weed control, etc. Kelvin said one of the management schemes is being a good neighbor and working with surrounding landowners to expand the footprint of the WMA. Kelvin said we hope that by working in partnerships we can enhance other wildlife habitats, etc. He said he and Julie have visited with the surrounding landowner and what kind of viable grazing options can happen with neighbors.

There was a comment about curlews and what kind of habitat they like, Kelvin said they like the land hammered or more open and short grasses, etc. There was a public comment that two FWP personnel had now used the word "hammered" and that is not the kind of word we should be using when discussing rangeland or wildlife resources. The comment was that curlews like short bunch grass areas. Kelvin did apologize in that he did not mean to say hammered but was using it more as a reference tool to compare between wildlife habitat scenarios. Mike also went on record for saying he did not mean that in the context when talking about resources of the WMA.

Dwight Crawford asked why can't grazing be included in this plan and why do some things have to go through MEPA and others do not. Mike said right now we are not far enough to include grazing in this plan but it could be done in the future.

Dwight Crawford asked what does a healthy forest mean as defined on page 28. Mike said it means a lot of thing such as weed encroachment, etc. It is more about what is on the ground currently.

Anaconda Sportsman made a comment in that we support grazing as long as it enhances wildlife and following the model that was done on Fleecer as it is a good model to show the cooperation between private and public lands.

He said the conversation is always about elk but we have consider the other species especially mule deer and antelope. Antelope are increasing and mule deer are disappearing.

The other issue is a shoulder season and Anaconda Sportsman are against having any shoulder seasons on public lands. Shoulder seasons need to be handled on private properties. The WMA has made a contribution to the health of elk but having a shoulder season is not supported by sportsman on public ground.

There was a comment about beavers and he felt that beavers needs to be re-introduced for stream health. He said cattle have trashed this property for 70 years and he felt that there should be no cattle on this property for the next 20 years.

There was a question about the county road and he wondered why FWP is not talking to the county commissioners and they should continue to keep that communication open between the agency and the county.

Public meeting notes continued from previous page . . .

There was a question about if there has ever been an inventory on carrying capacity of these properties and forage volume that is being taken by grazing on public ground. Mike asked if he meant the WMA specifically or all public ground. This was not clarified but the comment was that with public leases, the forage volume that is being taken away could be replaced with 1300 head of elk.

There was a question about fire on the WMA and how would that be managed especially on a grassland area and how are prescribed fires going to be managed as he would like to see more of that in the plan.

Gary Swant asked how would grazing be managed and would they have to do it by foot or horseback since the general public has to do the same with no motorized vehicles.

Matt Graveley said if a rancher is grazing, he is working to improve the habitat and is working for the FWP. He said it is also a benefit for both properties.

Marty Dippold commented about predators and the only predator he sees right now on the WMA is human beings controlling the movement of wildlife, etc. He said if you don't control your predators, it changes the movement of elk, etc. We have large herds of elk that are destroying public and private grounds as they are no longer in little herds scattered through the landscape.

Matt Graveley asked if there is a plan to do an inventory in MU 5. As that can be a problem with weeds between the forest service and the WMA, etc.

There was a question about what happens if someone gets burned out can the WMA be a temporary place for someone to bring their cattle, etc. Mike said that can be complicated as do we have the infrastructure to make it work, and then the fact comes that could come up every year and how do you make those fair management decisions.

Rick Northrup said right now they are working with a rancher in eastern Montana to see if he can use one of the WMAs in that part of the state to give them a year of relief.

There was a question about the reservoir and what is the long term plan. Jason Lindstrom commented in that the water rights are owned by a private landowner and FWP has no rights to the water. He said they would not be stocking it with fish as it has live water coming in there but is a non-channeled reservoir. Public can access it but there won't be any future development for now.

Meeting was adjourned,

Respectfully submitted,

Jodi Pauley, Secretary

APPENDIX C:
Draft
exchange of use
cooperative grazing system
to be implemented on the
Spotted Dog Wildlife Management Area
and adjacent private lands in Powell County, Montana

PROPOSED COOPERATIVE GRAZING SYSTEM

WMA PASTURES

Map 1 illustrates WMA pasture layout. Pastures have been assigned names; From north to south, there is The Bench, Fir Island, West Fork, and Wineglass Pastures.

The Bench and Fir Island Pastures utilize the existing WMA internal fence to the west, which defines the eastern boundary of the elk winter range, as well as the existing WMA internal fence on the southern boundary of Fir Island Pasture. Eastern boundaries of these pastures are configured to accommodate the jutting nature of the existing willow community into these pastures. Remaining boundaries would be created via temporary electric fence.

West Fork and Wineglass Pastures utilize existing WMA fences as well. The north boundary of West Fork is the existing east-west internal fence. The west boundary of both pastures is the existing fence which defines the eastern boundary of the elk winter range. The south boundary of Wineglass Pasture is the WMA boundary fence. Remaining boundaries would be created via temporary electric fence.

In addition to efforts to provide ample and distributed water sources in each pasture, as well as equitable livestock carrying capacities, pasture boundary design considers locations where willows or aspen stands could possibly be fenced out with minimal effort. For example, the shared boundary between Wineglass and West Fork Pastures include both willow and aspen stands. During the year Wineglass is grazed, willows and aspen stands could easily be located just to the north of the pasture. During the next year when West Fork is grazed, they could easily be located just to the south of the pasture. By default, they essentially could be “fenced out”, and would not receive any grazing pressure by being excluded each year.

Pasture sizes have been developed using on-site field evaluations, combined with on-line NRCS Web Soil Survey website to create pastures that connect elk winter range with elk summer range, provide ample dependable watering sources, and provide equitable carrying capacities for a livestock herd for the months of June and July.

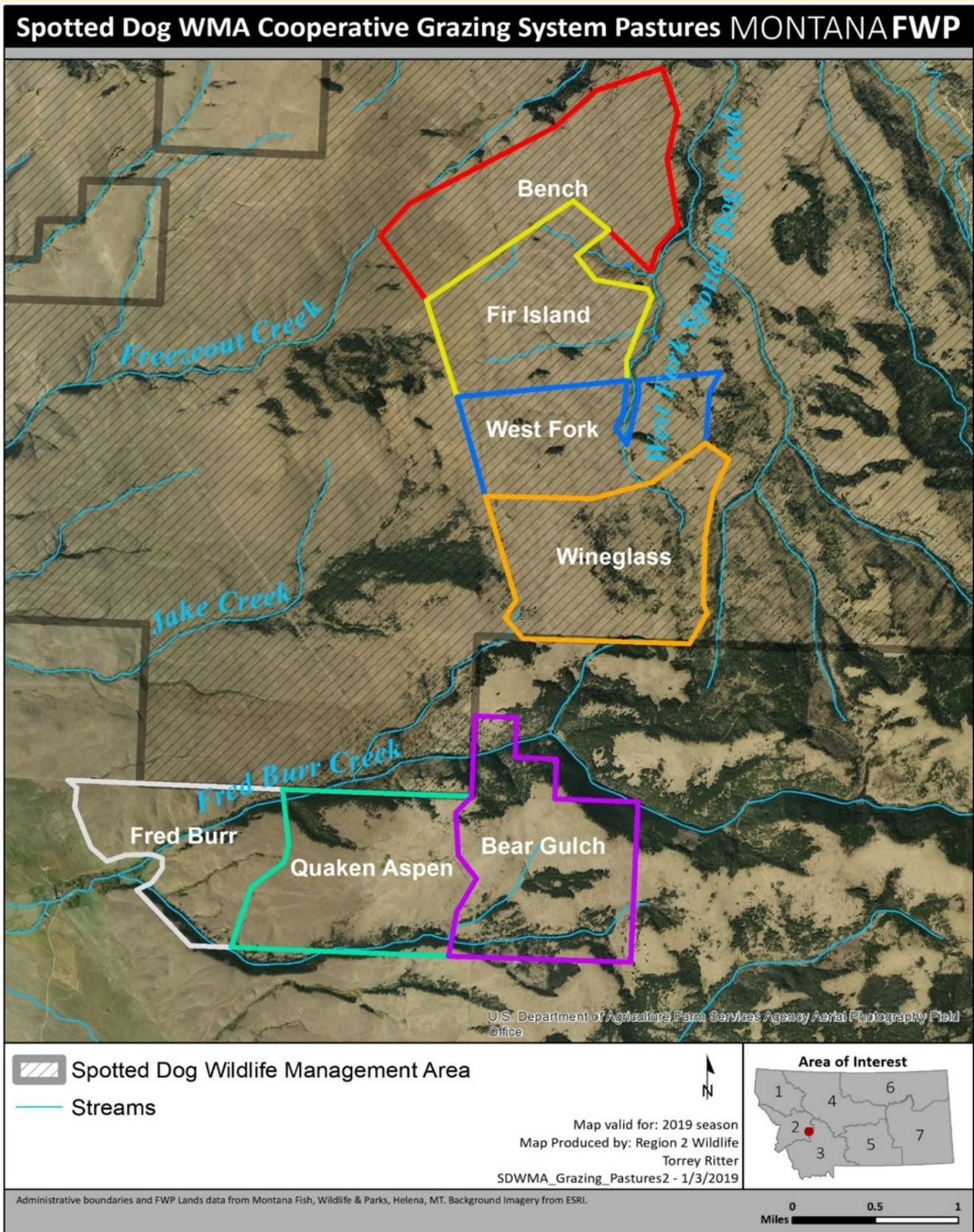
Each pasture would be grazed once every 4 years. Under this cycle, between 600 to 750 acres would be treated annually within the approximately 2,800-acre transition zone.

PRIVATE PASTURES

Map 1 also illustrates private pasture layout. There are 3 native, private pastures comprising approximately 2,100. From west to east, these pastures are named the Fred Burr, Quaking Aspen, and Bear Gulch Pastures, and are part of the McQueary Ranch. These pastures traditionally sustain a lot of elk winter use, especially the Fred Burr Pasture.

Each pasture would be grazed once every 3 years. Under this cycle, between 600 – 700 acres would be grazed annually within the approximate 2,100-acre winter range.

Map 1: WMA pastures and McQueary Ranch pastures.



GRAZING SCHEDULES

The grazing schedule for the proposed pastures on the WMA is described in Table 1 under the “WMA Pastures” portion of the table. The “McQueary Ranch” portion of the table describes the proposed grazing schedule for the 3 private pastures that would be grazed cooperatively with these 4 WMA pastures.

Each year, livestock will graze on one pasture on the WMA during the growing season, and then graze on one pasture on the private land during the late season (post-seed-ripe), and all other pastures included in this proposed cooperative exchange of use grazing system are rested. Grazing will rotate to different pastures each year.

Should additional private land pastures be added to this cooperative exchange of use grazing system, the same type of schedule that includes grazing deferment and rest would be followed on those lands.

Table 1: Proposed schedule for the cooperative exchange of use grazing system.

WMA Pastures					McQueary Ranch		
Year	The Bench	Fir Island	West Fork	Wineglass	Fred Burr	Quaking Aspen	Bear Gulch
2019	Rest	Rest	Rest	6/1 - 7/31	Rest	Rest	8/1 - 9/30
2020	Rest	Rest	6/1 - 7/31	Rest	Rest	8/1 - 9/30	Rest
2021	Rest	6/1 - 7/31	Rest	Rest	8/1 - 9/30	Rest	Rest
2022	6/1 - 7/31	Rest	Rest	Rest	Rest	Rest	8/1 - 9/30
2023	Rest	Rest	Rest	6/1 - 7/31	Rest	8/1 - 9/30	Rest
2024	Rest	Rest	6/1 - 7/31	Rest	8/1 - 9/30	Rest	Rest
Growing Season Grazing:		Livestock could graze at any time between June 1 and July 31.					
Late Season Grazing:		Livestock could graze at any time from August 1 until September 30, or when livestock are typically brought home for weaning and shipping.					
Grazing Rest:		Pastures would be completely rested from livestock grazing for the calendar year.					